

**Student Achievement and School Accountability Program (SASA)
Monitoring Plan for Formula Grant Programs
for
October 1, 2005 to September 30, 2006**



October 2005

Title I, Part A Compliance Monitoring
Monitoring Procedures Handbook
Table of Contents

I. INTRODUCTION	1
II. CONTENT OF MONITORING	2
<i>Monitoring Indicators</i>	2
<i>A. Monitoring Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies (Title I, Part A)</i>	3
<i>B. Monitoring Title I, Part B, Subpart 3: William F. Goodling Even Start Family Literacy Programs (Even Start)</i>	3
<i>C. Monitoring Title I, Part D: Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk (N/D)</i>	4
<i>D. Monitoring Title X, Part C: McKinney-Vento Homeless Education Assistance Act of 2001</i>	4
<i>A. The Desk Monitoring and Document Review</i>	4
<i>B. Monitoring Schedule</i>	5
<i>C. Monitoring Team</i>	5
<i>D. Conducting the Site Visit</i>	5
<i>E. Additional Monitoring</i>	5
IV. MONITORING FEEDBACK AND FOLLOW-UP	6
<i>A. Monitoring Report</i>	6
<i>B. SEA Response</i>	6
<i>C. Conditions</i>	6
<i>D. Follow-Up</i>	6
<i>E. Report Analysis</i>	7
APPENDIX A: MONITORING INDICATORS FOR TITLE I, PART A	10
APPENDIX B: MONITORING INDICATORS FOR TITLE I, PART B: EVEN START	59
APPENDIX C: MONITORING INDICATORS FOR TITLE I, PART D (N/D)	79
APPENDIX D: MONITORING INDICATORS FOR TITLE X, PART C	85

I. INTRODUCTION

Monitoring the use of federal funds has long been an essential function of the U. S. Department of Education (ED). Perhaps no funding has more potential for positively impacting the education of the nation's children than the nearly \$13 billion dollars that is awarded to State and local educational agencies through Title I, Part A, Improving Basic Programs Operated by Local Educational Agencies.

In addition, in 2005-06 States received nearly \$335 million for the following formula grant programs: the William F. Goodling Even Start Family Literacy Program (Even Start), Title I, Part B (Subpart 3); the Prevention and Intervention Program for Children and Youth Who are Neglected, Delinquent or At-Risk of Dropping Out (N/D), Title I, Part D; and, the McKinney-Vento Homeless Education Assistance Act of 2001 (Homeless), Title X, Part C. The Student Achievement and School Accountability (SASA) programs office is responsible for the administration of these four programs. The purpose of this document is to describe the purpose, rationale, and process used by SASA in monitoring the use of these funds by State educational agencies (SEAs) for the 2005-2006 fiscal year. This document will be reviewed and revised annually to reflect lessons learned and changing trends.

A. Definition and Purpose of Monitoring

A monitoring review is the regular and systematic examination of a State's administration and implementation of a federal education grant, a contract or a cooperative agreement administered by the U. S. Department of Education.

Monitoring of SASA programs is necessary to ensure that *all* children have a fair, equal, and significant opportunity to obtain a high-quality education. Monitoring assesses the extent to which States provide leadership and guidance for local educational agencies (LEAs) and schools in implementing policies and procedures that comply with the Title I, Part A; Even Start; N/D; and Homeless statutes and regulations.

Monitoring formalizes the integral relationship between ED and the States. It emphasizes, first and foremost, accountability for using resources wisely in the critical venture of educating and preparing our nation's students. Using monitoring indicators clarifies for the States and for the ED monitors, the critical components of this accountability and provides a performance standard against which State policies and procedures can be measured. As a result of monitoring, ED is able to gather accurate data about State and local needs and use that data to design technical assistance initiatives and national leadership activities. Thus, monitoring serves not only as a means for helping States achieve high quality implementation of educational programs, it also helps ED be a better advisor and work with States in that effort. SASA monitoring efforts are designed to focus on the results of States' efforts to implement critical requirements of NCLB using available resources and fiscal flexibility provisions available to States and LEAs. Data from State monitoring also informs progress on the program's performance indicators under the Government Performance Results Act.

ED policy requires every program office overseeing discretionary or formula grant programs to prepare a monitoring plan for each of its programs. The plans are designed to establish monitoring procedures that advance the grantee's progress in achieving program goals and objectives; adhering to laws, regulations, and assurances governing the program; and conforming to the approved application, performance reports or other relevant documents. In a July 2002 memo from the Deputy Secretary, each principal office was advised to monitor (1) for results; (2) to ensure compliance with the law; and, (3) to

protect against waste, fraud and abuse. This document reflects SASA’s response to this policy memorandum.

B. Monitoring and the Strategic Plan

Regular monitoring of SEA and LEA Title I programs contributes to the accomplishment of the following objectives and strategies outlined in the Education Department’s 2002-2007 *Strategic Plan*:

Objective 1.1	Link federal education funding to accountability for results.
Strategy A	Provide technical assistance.

Objective 1.2	Increase flexibility and local control.
Strategy A	Publicize flexibility provisions to the States.
Strategy C	Foster a customer service orientation at the Department.
Strategy D	Reduce the data collection and reporting burden while increasing the usefulness of the data.

Objective 1.3	Increase information and options for parents.
Strategy A	Require school report cards.
Strategy C	Provide choices to children trapped in low-performing or unsafe schools.

Objective 2.1	Ensure that all students read on grade level by the third grade.
Strategy A	Hold schools accountable for improving reading achievement.
Strategy B	Promote early cognitive development.

Objective 2.3	Improve the performance of all high school students.
Strategy A	Hold schools accountable for student achievement.

II. CONTENT OF MONITORING

The content of SASA’s monitoring is based on the States’ obligation to provide guidance and support to LEAs and schools based on the requirements of the No Child Left Behind Act (NCLB). Those requirements, found in the statute and the regulations, are framed by four keystone principles of NCLB: accountability, flexibility, parent option and involvement, and the use of scientifically based research or “what works.” Monitoring States’ implementation of SASA programs means taking a close look at how States have instituted policies, systems, and procedures to ensure LEA and school compliance with the statute and regulations. The requirements and principles are embedded in the three key monitoring areas: standards, assessment and accountability; instructional support; and fiduciary responsibilities. The monitoring indicators for each of these areas are described in the following section.

Monitoring Indicators

ED uses clear and consistent criteria—monitoring indicators—to determine the degree of implementation of SEA programs and activities. For the four programs monitored under this plan,

SASA staff has developed indicators in each of the three monitoring areas (standards, assessment and accountability; instructional support; and, fiduciary responsibilities). The use of such criteria ensures a consistent application of these standards across monitoring teams and across States. The published indicators provide guidance for all States regarding the purpose and intended outcomes of monitoring by describing what is being monitored and providing the criteria for judging the quality of implementation (acceptable evidence).

The complete texts of the monitoring indicators for each SASA program monitored under this plan are contained in the Appendices. Please note that the indicators are written broadly to cover all the requirements of each topic. Examples of documentation and evidence that States and LEAs can provide to show compliance with these requirements for each indicator are listed for each indicator.

A. Monitoring Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies (Title I, Part A)

“The purpose of this title is to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education and reach, at a minimum, proficiency on challenging State academic achievement standards and State academic assessments,” (Title I, Sec.1001).

Title I, Part A provides financial assistance through SEAs to LEAs and schools with high numbers or percentages of poor children to help meet the educational needs of children who are most at risk of failing to meet challenging State academic standards. SEAs have significant and far-reaching responsibilities to LEAs that support the purpose of this title. Some of those major responsibilities include assuring that assessments, accountability systems, teacher preparation and training, curriculum, and instructional materials are aligned with each State’s academic standards; meeting the educational needs of low-achieving children; focusing on closing the achievement gap and targeting resources to those LEAs and schools with the greatest needs; providing parents with opportunities to be involved in meaningful ways in the education of their children; and holding schools and LEAs accountable for improving the academic achievement of all students. (Appendix A)

B. Monitoring Title I, Part B, Subpart 3: William F. Goodling Even Start Family Literacy Programs (Even Start)

“It is the purpose of this subpart to help break the cycle of poverty and illiteracy by improving the educational opportunities of the Nation’s low-income families.” (Title I, Part B, Subpart 3, Sec. 1231.)

Even Start offers promise in helping to break the intergenerational cycle of poverty and low literacy in the nation. The program integrates early childhood education, adult literacy (adult basic and secondary-level education and/or instruction for English language learners), parenting education, and interactive parent and child literacy activities into a single, unified family literacy program. At a minimum, a successful Even Start project should: build on high-quality community resources, employ qualified staff, carry out instructional activities grounded in scientifically based reading research, be able to document significant literacy achievement results (for both adults and children) in the families served, and make sufficient program progress as defined by the State. (Appendix B)

C. Monitoring Title I, Part D: Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk (N/D)

“It is the purpose of this part to improve educational services for children and youth in local and State institutions for neglected or delinquent children and youth so that such children and youth have the opportunity to meet the same challenging State academic content standards and challenging State student academic achievement standards that all children in the State are expected to meet.” (Title I, Part D, Sec. 1401.)

A growing juvenile correctional system and the educational needs of students in that system, established the need for the N/D program. SEAs provide financial assistance to State agencies and LEAs to promote educational programs for youths in state-operated institutions or community day programs to ensure that those students are provided a high quality education. The N/D program also helps to support instructional strategies for these students that school districts operate in collaboration with locally operated correctional facilities. (Appendix C)

D. Monitoring Title X, Part C: McKinney-Vento Homeless Education Assistance Act of 2001

“Each State educational agency shall ensure that each child of a homeless individual and each homeless youth has equal access to the same free, appropriate public education, including a public preschool education, as provided to other children and youths.” (Title X, Part C, Sec. 721(1))

The McKinney-Vento program is designed to address the problems that homeless children and youth face in enrolling, attending, and succeeding in school. Homeless children and youth should have access to the educational and other services that they need to meet the same challenging State student academic achievement standards to which all students are held. States and LEAs are required to review and undertake steps to revise laws, regulations, practices, or policies that may act as barriers to the enrollment, attendance, or success in school of homeless children and youth. (Appendix D)

III. THE MONITORING PROCESS

A. The Desk Monitoring and Document Review

SASA onsite monitoring visits to States are just one component of a continuous process of tracking State progress in implementing the statutes and regulations of SASA’s programs. A State contact is assigned to each State and this State contact is responsible for managing and updating the desk monitoring process on an on-going basis to ensure that the most current information regarding the contact’s State(s). This information is collected primarily through Web-based searches and document analysis. When a State is identified for on-site monitoring, the State contact briefs the monitoring team based on the content of the desk review. This briefing provides background and contextual information and highlights areas of potential interest or concern.

Once the State contact has briefed the monitoring team, the team determines if any additional SEA materials need to be collected. A thorough analysis of relevant documents is crucial to conducting an effective and efficient monitoring visit; document analysis helps team members identify important issues and questions *before* the visit, ensuring focused and productive interviews *during* the visit.

As needed, the State contact also provides briefings and/or reports to SASA and other senior leadership. Reports may be generated at any time using the State contact's desk monitoring forms, which are updated on a routine basis.

B. Monitoring Schedule

On-site monitoring is done on a 3-year cycle, with approximately one-third of the States monitored per year. The onsite monitoring cycle begins each year on October 1 and concludes September 30 with regular on-site visits occurring during all months except July and August. Follow-up monitoring, outside of the scheduled cycle may be arranged as needed if a State has serious or chronic compliance problems or has unresolved issues from the monitoring visit. These visits usually occur during the months of July and August.

C. Monitoring Team

At least six or seven SASA staff members participate in the monitoring site visit. In larger States, two teams may be assigned to conduct monitoring activities. One of the team members is designated as the team leader. State contacts and site visit teams work together throughout the monitoring process, including planning, research, on-site review, debriefing, and report writing.

Staff from the Office of the Chief Officer (OCFO) also participates in site visits. In 2002, Congress enacted the Improper Payments Information Act (IPIA). This act requires that Federal agencies conduct risk assessments to determine if program funds are being delivered and administered in a manner that complies with the congressional appropriation. Title I is one of about 45 programs for which the Office of Management and Budget specifically requests erroneous payment information under IPIA. In order to strengthen the effectiveness of monitoring fiduciary critical elements and effectively comply with the requirements of the IPIA the two offices, OCFO and OESE, agreed to partner in an enhanced review process.

D. Conducting the Site Visit

On-site monitoring visits typically last four to five days. During the site visit SASA staff review documentation that was not available prior to the trip and interview SEA and LEA staff, principals, teachers, parents, and other stakeholders, both individually and in groups. This multi-level interview strategy allows the monitors to gather information from a variety of perspectives and better evaluate the impact of the State's administration on the implementation of the four programs at the LEA and school level.

E. Additional Monitoring

After the on-site monitoring is completed, the team conducts, at a minimum, 2 to 3 follow-up conference calls with selected LEAs across the State to complete its information gathering process. This strategy allows the monitoring team to confirm information gathered during the visit and acquire a more complete picture of the degree of program implementation across the State.

IV. MONITORING FEEDBACK AND FOLLOW-UP

A. Monitoring Report

The SASA team provides a comprehensive monitoring report to the SEA within 30 business days of the on-site visit. Each member of the monitoring team drafts individual sections, and the team leader oversees the development of the final report. The report summarizes for States the status of their implementation of the requirements of the Title I, Part A; Even Start; N/D; and Homeless programs. The report contains findings, recommendations, and required corrective actions that provide a synopsis of the degree of implementation and compliance of the four programs monitored.

B. SEA Response

Upon receipt of the report, the SEA has 30 business days to respond to any findings and required actions. SEA responses are carefully reviewed to ensure that all compliance issues identified in the monitoring report have been addressed. If an SEA does not respond to the report within these established timelines, the team leader will contact the SEA to determine if an additional ten days is required. If after the additional ten days, the Department has not received the SEA's response, the SASA director will send a letter to the State Superintendent, and an additional ten-day extension will be granted, if required. If the SEA has not responded after the additional time, the SASA director will send a recommendation to the Assistant Secretary for further action. When the monitoring team determines that the SEA has taken steps to ensure full statewide compliance in the identified areas and provided documentation that the actions have been implemented, SASA's Director sends a letter to the State for final approval.

C. Conditions

States with significant compliance findings will have conditions attached to the grant award for that program. For example, a State with a finding in Title I, Part A would have an "Attachment T" affixed to its Title I, Part A grant as a condition of the grant award. The Attachment T indicates that the grant award is subject to the appropriate resolution of corrective actions identified by the Department in its monitoring visit. Conditions are normally attached only after the State has had the opportunity to respond to the monitoring report and outline its corrective action plans. Resolution will be considered appropriate only after the State submits information or evidence of the implementation of the corrective actions it has taken and the Department concludes that the actions taken address the findings in an appropriate manner. If appropriate corrective actions are not taken in a timely manner, the Department may request additional information, revise the special condition to require further action, or provide notice of its intent to take further administrative action.

D. Follow-Up

The State contact updates the State's monitoring file, collecting documents, memoranda, a copy of the monitoring report, and other supporting materials as needed.

If necessary, the monitoring team leader schedules a follow-up review within the year to verify the implementation of required corrective actions and to provide technical assistance as necessary.

E. Report Analysis

The monitoring group maintains a database of all site visit reports by monitoring cycle. From the database, SASA staff analyzes the findings and recommendations from each report in order to obtain a more complete picture of implementation trends across all States. These analyses will inform efforts to provide national leadership activities and technical assistance to States on a regional and national level.

Overarching Requirement – SEA Monitoring

A State's ability to fully and effectively implement the requirements of NCLB is directly related to the extent to which it is able to regularly monitor its LEAs and provide quality technical assistance based on identified needs. This principle applies across all Federal programs under NCLB.

Federal law does not specify the particular method or frequency with which States must monitor their grantees, and States have a great deal of flexibility in designing their monitoring systems. Whatever process is used, it is expected that States have mechanisms in place sufficient to ensure that States are able to collect and review critical implementation data with the frequency and intensity required to ensure effective (and fully compliant) programs under NCLB. Such a process should promote quality instruction and lead to achievement of the proficient or advanced level on State standards by all students.

SASA monitors will incorporate the following questions about SEA monitoring (identification and correction) in each of the indicator areas for all four of the programs reviewed. Further, all corrective actions that result from an onsite review will include a component that requires the SEA to describe its method(s) of monitoring and oversight of the requirement.

SEA Monitoring Questions

- Does the SEA monitor for these requirements? How? How frequently?
- Was this area/element identified as a finding in the most recent monitoring of your district/project by the SEA?
- If yes:
 - What [specifically] was the finding?
 - When was the finding identified?
 - What was the LEA/project required to do to ensure that the finding was corrected?
 - Was there any follow-up by the SEA to ensure that the issue had been addressed/corrected?

Following is the indicator that addresses SEA monitoring. This indicator is consistent with the program-specific indicators that follow in Appendices A-D, and includes the specific documentation to be reviewed and interview data that will be collected by Federal program monitors.

General Requirements – SEA Sub-recipient Monitoring

The SEA conducts monitoring of its subgrantees sufficient to ensure compliance with Title I program requirements.

Section 9304(a)(1); Section 9304(a)(3)(C); Section 80.40 of EDGAR

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Established cycle of monitoring. • Monitoring policies and procedures* • Data collection instruments (interview guides, document review checklists)* • Sample of letters to LEAs, checklists, forms, etc. • Process for identification of 'high risk' grantees • Process for follow-up/verification of implementation of required corrective actions • Monitoring reports, corrective actions from the LEAs visited as part of the onsite review <p>*Must include a method for monitoring <u>all</u> critical NCLB requirements</p> <p><u>Interview:</u></p> <ul style="list-style-type: none"> • Staff explains schedule of monitoring, including 'off cycle' monitoring. • Staff describes monitoring process, including on-site procedures, data review, reporting and method(s) for ensuring corrective action. • Staff discusses technical assistance to subgrantees regarding program requirements. • Staff describes how data collected through the monitoring process informs other SEA activities (technical assistance, etc.) • Staff describes procedures (criteria) for identification of high-risk LEAs/grantees. • SEA cites examples of prior identification of high-risk grantees, and describes the consequences of such identification. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Copies of reports, corrective actions, results of technical assistance. • Sample of letters to schools, checklists, forms, etc. • Evidence of technical assistance provided by the SEA as a result of issues identified through the monitoring process. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • Staff describes monitoring process, including on-site procedures, data review, and the reporting and corrective action processes, as pertains to most recent monitoring by the SEA. • Staff discusses technical assistance provided by SEA during and as a result of monitoring process.

APPENDIX A: MONITORING INDICATORS FOR TITLE I, PART A

Title I, Part A Accountability Indicators

1.1: SEA has approved academic content standards for all required subjects or has an approved timeline for developing them. (Sec. 11111(b)(1))	
SEA REVIEW	LEA REVIEW
<p>1.1.1</p> <p>(a) Has the State formally approved/adopted, by May 2003, challenging academic content standards in reading/language arts and mathematics that –</p> <ul style="list-style-type: none"> cover each of grades 3-8 and the 10-12 grade range, <i>or</i> if the academic content standards relate to grade ranges, include specific content expectations for each grade level? <p style="text-align: center;">AND</p> <p>(b) Are these academic content standards applied to <i>all</i> public schools and students in the State?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> Written documentation in the form of State Board of Education minutes, regulations, official reports, letters or memoranda from the State to the LEAs, or other existing documents (i.e., not written by the State only to fulfill the requirements of the peer review process). Or, in States where the Chief State School Officer has the power to approve standards, written documentation of the formal approval of the final form of the reading/language arts and mathematics standards. Letter from ED approving the content standards for grades 3 through 8 and high school if these content standards have not been changed in any way since approval. Documents that include or are based on the academic content standards explicitly address the needs of students with disabilities and limited English proficient students. 	

1.1: SEA has approved academic content standards for all required subjects or has an approved timeline for developing them. (Sec. 11111(b)(1))	
SEA REVIEW	LEA REVIEW
<p>1.1.2 Has the State formally approved/adopted academic content standards in science for elementary (grades 3-5), middle (grades 6-9), and high school (grades 10-12) by the 2005-06 school year?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> Written documentation in the form of State Board of Education minutes, regulations, official reports, letters or memoranda from the State to the LEAs, or other existing documents (i.e., not written by the State only to fulfill the requirements of the peer review process). Or, in States where the Chief State School Officer has the power to approve standards, written documentation of the formal approval of the final form of the science standards. Letter from ED approving the content standards for science. 	SEA Requirement

1.2: SEA has approved academic achievement standards and alternate academic achievement standards in required subject areas and grades or has an approved timeline to create them. (Sec. 11111(b)(1))	
SEA REVIEW	LEA REVIEW
<p>1.2.1</p> <p>Has the State also approved alternate academic achievement standards, for students with the most significant cognitive disabilities, in science for each of the grade spans tested? If alternate achievement standards have not been developed and approved, then the alternate assessments for students with disabilities must be based on grade-level achievement standards.</p>	

1.2: SEA has approved academic achievement standards and alternate academic achievement standards in required subject areas and grades or has an approved timeline to create them. (Sec. 11111(b)(1))	
SEA REVIEW	LEA REVIEW
<p>1.2.2</p> <p>Has the State formally approved/adopted academic achievement descriptors in science for each of the grade spans 3-5, 6-9, and 10-12 (not due until school year (SY) 2005-2006)?</p> <p>Has the State formally approved academic achievement standards cut scores in science for each of the grade spans 3-5, 6-9, and 10-12 (not due until school year (SY) 2007-08)?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> Written documentation in the form of State Board of Education minutes, regulations, official reports, letters or memoranda from the State to the LEAs, or other existing documents (i.e., not written by the State only to fulfill the requirements of the peer review process). Or, in States where the Chief State School Officer has the power to approve standards, written documentation of the formal approval of the final form of the science standards. Letter from ED approving the academic achievement standards for science. 	SEA Requirement

1.3: The SEA has approved assessments and alternate assessments in required subject areas and grades or has an approved timeline to create them. (Sec. 1111(b)(3)).

Overview of the Statewide Assessment System

Section 1.3.1 Use the chart that follows to indicate your State's current assessment system in reading/language arts and mathematics in grades 3 through 8 and for the 10-12 grade range using the abbreviations: (a) criterion-referenced assessments (**CRT**); or (b) augmented norm-referenced assessments (**ANRT**) (augmented as necessary to measure accurately the depth and breadth of the State's academic content standards and yield criterion-referenced scores); or (c) a combination of both across grade levels and/or content areas. Also indicate your current assessment system in science (not required until 2007-8) aligned with the State's challenging academic content and achievement standards at least once in each of the grade spans 3-5, 6-9, and 10-12. A State may have assessments in reading and/or language arts depending on the alignment to the State's content standards. Please indicate, using the abbreviations shown, the grades and subject areas with availability of native language assessment (**NLA**) or various alternate assessments (**AA-SWD** for an alternate assessment for students with disabilities based on grade-level standards; **AA-LEP** for an alternate assessment for students with limited English proficiency based on grade-level standards, and/or **AA-AAS** for an alternate assessment for students with the most significant cognitive disabilities based on alternate achievement standards).

Chart of State Assessment System Aligned to Content Standards for school year _____ by Subject, Grade, and Type of Assessment

Grades	3	4	5	6	7	8	9	10	11	12
Math										
Alternate										
Native Lang.										
Reading										
Alternate										
Native Lang.										
Language arts										
Alternate										
Native Lang.										
Grade Spans	3 – 5			6 – 9			10 - 12			
Science										
Alternate										
Native Lang.										

Date State Assessment System Approved by ED: IASA _____ NCLB _____

Test Window 2005-06 (Enter Dates) _____

1.3: The SEA has approved assessments and alternate assessments in required subject areas and grades or has an approved timeline to create them. (Sec. 1111(b)(3))

SEA REVIEW

LEA REVIEW

1.3.2
How has the State ensured that its assessment system will provide coherent information across grades and subjects?

Documentation

- State materials display assessments by grade with information about test structure and appropriate interpretation of results.
- Chart shows relative contribution of reading and writing tests to a single English language arts score.

State Requirement

1.3: The SEA has approved assessments and alternate assessments in required subject areas and grades or has an approved timeline to create them. (Sec. 1111(b)(3))

SEA REVIEW	LEA REVIEW
<p>1.3.3 What guidelines does the State have in place for including all students with disabilities in the regular assessment system?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • The State's guidelines, as communicated to LEAs, for the inclusion of all students with disabilities in the assessment system. • Existing written documentation describing the form and content of alternate assessments for students with disabilities, the process by which these assessments were developed, and the process by which the State has ascertained the alignment of these assessments with its academic content standards and academic achievement standards—both grade-level and alternate, as applicable. • Report that shows that 100% of students with disabilities are taking the regular assessment or an alternate assessment. • State curriculum and/or test administration guides that inform educators about the inclusion of students with disabilities in regular assessments, with or without accommodations, or alternate assessments based on grade-level standards, or, if the State allows it, alternate assessments based on alternate achievement standards <p><u>Interview</u></p> <ul style="list-style-type: none"> • If the State has approved/adopted alternate achievement standards, what guidelines does the State have in place for assessing only students with the most significant cognitive disabilities based on alternate achievement standards? 	<p><u>Documentation</u></p> <ul style="list-style-type: none"> • LEA reports show that 100% of students with disabilities are taking the regular assessment or an alternate assessment. • LEA curriculum and/or test administration guides that inform educators about the inclusion of students with disabilities in regular assessments, with or without accommodations, or alternate assessments based on grade-level standards, or, if the State allows it, alternate assessments based on alternate achievement standards • Documentation on the number of special education children taking the various alternate assessments compared to the previous year's test takers <p><u>Interview</u></p> <ul style="list-style-type: none"> • Did the LEA exceed the 1% cap on the percentage of students proficient for AYP purposes on alternate assessments aligned with alternate achievement standards? On what basis was the 1% cap exceeded? Was the exception approved by the State?

1.3: The SEA has approved assessments and alternate assessments in required subject areas and grades or has an approved timeline to create them. (Sec. 1111(b)(3))	
SEA REVIEW	LEA REVIEW
<p>1.3.4 What guidelines does the State have in place for including all students with limited English proficiency in the tested grades in the assessment system? ¹</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> The State's guidelines, as communicated to LEAs, calls for the inclusion of all limited English proficient students in its assessment system. Existing written documentation describing the form and content of any alternate assessments for limited English proficient students, the process by which these assessments were developed, and the process by which the State has ascertained the alignment of these assessments with its academic content standards and academic achievement standards and comparability of results with the regular test. <p><u>Interview</u></p> <ul style="list-style-type: none"> Does State have appropriate accommodations for LEP? What is the State's definition of LEP? What is the State's exit criteria? 	<p><u>Documentation</u></p> <ul style="list-style-type: none"> LEA can document the participation of LEP students on tests of English language proficiency for the district and by school. Does the LEA know the State's definition of LEP and the State's LEP exit criteria and are they applying appropriate accommodations for LEP students? <p><u>Interview</u></p> <ul style="list-style-type: none"> Are the LEP accommodations being applied on test day?

¹ Letter from Secretary Rod Paige dated February 20, 2004 permits flexibility in assessing new limited English proficient students and in calculating adequate yearly progress. For assessments administered during the 2003-04 school year, including those given during the fall 2002, the Secretary has permitted States to exempt recently arrived LEP students (i.e., those students in their first year of enrollment in U. S. schools) from taking the State's reading/language arts assessment.

1.4: Assessments should be used for purposes for which such assessments are valid and reliable, and be consistent with relevant, nationally recognized professional and technical standards (Sec. 1111(b)(3)(C)(iii).

Adequate yearly progress shall be defined by the State in a manner that is statistically valid and reliable (Sec. 1111(b)(2)(C)(ii)).

SEA REVIEW	LEA REVIEW
<p>1.4.1 Has the State established clear quality control criteria for the administration, scoring, analysis, and reporting components of its assessment system, including alternate assessment(s)?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • The State's quality control criteria for administration, scoring, analysis, and reporting are communicated to its contractor(s). • The State's test security policy and consequences for violation are communicated to the public and to local educators. • Is there evidence that the State monitors State assessment system test administrations taking place in the LEA's? • Existing written documentation of the State's plan for training and monitoring assessment administration conditions across the State, even when its assessment system is comprised of only local assessments. <p><u>Interview</u></p> <ul style="list-style-type: none"> • Does the State have a system for monitoring and improving the on-going quality of its assessment system? 	<p><u>Documentation</u></p> <ul style="list-style-type: none"> • LEA has written procedures for ensuring data quality. • LEA provides evidence indicating that written procedures for ensuring data quality were communicated to the LEA's by the State and implemented. • Documentation provided on how any data quality issues related to assessment has been addressed, including security breaches. • Is there evidence that the LEA monitors State assessment system test administrations taking place in the schools?

1.4: Assessments should be used for purposes for which such assessments are valid and reliable, and be consistent with relevant, nationally recognized professional and technical standards (Sec. 1111(b)(3)(C)(iii).

Adequate yearly progress shall be defined by the State in a manner that is statistically valid and reliable (Sec. 1111(b)(2)(C)(ii).

SEA REVIEW	LEA REVIEW
<p>1.4.2 The SEA has an internal quality control system for ensuring and maximizing the quality, objectivity, utility, and integrity of information disseminated by the agency.</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • The State checks to ensure that accurate data is reported to ED and maintains written records of errors and the steps taken to correct data errors. • Written procedures for ensuring data quality. • Documents indicating that written procedures for ensuring data quality were implemented. • Evidence that LEAs have been provided technical assistance on data quality issues. 	<p><u>Documentation</u></p> <ul style="list-style-type: none"> • LEA information on assessment and accountability reported to ED is accurate. • LEA provides evidence indicating that written procedures for ensuring data quality were communicated to the LEA's by the State and implemented. • Documentation provided on how any data quality issues related to school and district accountability has been addressed.
<p>1.4.3 The State has a documented procedure for districts and schools to appeal AYP data and decisions.</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • State has disseminated timeline and procedures for appeals to all LEAs that permits timely release of AYP determinations. • State maintains written record of appeals with a record of results. 	<p><u>Documentation</u></p> <ul style="list-style-type: none"> • The LEA has a procedure for reviewing preliminary AYP results and communicating corrections to the State.

1.5: The SEA has implemented all required components as identified in its accountability workbook. (Sec. 1111(b)(2))	
SEA REVIEW	LEA REVIEW
<p>1.5.1 Does the State have an NCLB accountability system plan that has been approved by ED?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> The State has an approval letter for its accountability system plan and an updated accountability workbook that reflects the areas approved in the letter. 	State Requirement
<p>1.5.2 How are all public schools and LEAs held to the same criteria when making an AYP determination?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> All public schools (e.g., public charter schools, alternative schools, etc.) and LEAs are systematically judged on the basis of the same criteria when making an AYP determination. What special procedures are being used to make accountability decisions about small schools? If applicable, the AYP definition is integrated into the State Accountability System. 	State Requirement
<p>1.5.3 How does the State provide accountability and adequate yearly progress decisions and information in a timely manner?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> State provides decisions about adequate yearly progress in time for LEAs to implement the required provisions before the beginning of the next academic year. State allows enough time to notify parents about public school choice or supplemental educational service options, time for parents to make informed decisions, and time to implement public school choice and supplemental educational services. 	State Requirement

1.5: The SEA has implemented all required components as identified in its accountability workbook. (Sec. 1111(b)(2))	
SEA REVIEW	LEA REVIEW
<p>1.5.4 How does the State Accountability System include all students in the State?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • All students in the State are included in the State Accountability System. • The definitions of "public school" and "LEA" account for all students enrolled in the public school district, regardless of program or type of public school. 	State Requirement
<p>1.5.5 How does the State define "full academic year" for identifying students in AYP decisions?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • The State has a definition of "full academic year" for determining which students are to be included in decisions about AYP. • The definition of full academic year is consistent and applied statewide. 	State Requirement
<p>1.5.6 How does the State Accountability System determine which students have attended the same public school and/or LEA for a full academic year?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • Does the State have data management capability that results in accurate records of attendance for all students, including mobile students? • State holds public schools accountable for students who were enrolled at the same public school for a full academic year. • State holds LEAs accountable for students who transfer during the full academic year from one public school within the district to another public school within the district. 	State Requirement

1.5: The SEA has implemented all required components as identified in its accountability workbook. (Sec. 1111(b)(2))	
SEA REVIEW	LEA REVIEW
<p>1.5.7 How does the State Accountability System make an annual determination of whether each public school and LEA in the State made AYP?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • AYP decisions for each public school and LEA are made annually. 	State Requirement
<p>1.5.8 How are students with disabilities included in the State's definition of adequate yearly progress?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • All students with disabilities participate in statewide assessments: general assessments with or without accommodations or an alternate assessment based on grade level standards for the grade in which students are enrolled. • State demonstrates that students with disabilities are fully included in the State Accountability System. 	State Requirement
<p>1.5.9 How are students with limited English proficiency included in the State's definition of adequate yearly progress?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • All LEP students participate in statewide assessments: general assessments with or without accommodations, LEP alternate assessments, or a native language version of the general assessment based on grade level standards. • State demonstrates that LEP students are fully included in the State Accountability System. • Policy that provides guidance on the assessment of new immigrant LEP students. 	State Requirement

1.5: The SEA has implemented all required components as identified in its accountability workbook. (Sec. 1111(b)(2))	
SEA REVIEW	LEA REVIEW
<p>1.5.10 What is the State definition of the public high school graduation rate?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> State definition of graduation rate: <ul style="list-style-type: none"> Calculates the percentage of students, measured from the beginning of the school year, who graduate from public high school with a regular diploma (not including a GED or any other diploma not fully aligned with the State's academic standards) in the standard number of years; or, Uses another more accurate definition that has been approved by the Secretary; and Must avoid counting a dropout as a transfer. 	State Requirement
<p>1.5.11 How do AYP determinations meet the State's standard for acceptable reliability?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> State has defined a method for determining an acceptable level of reliability (decision consistency) for AYP decisions. State provides evidence that decision consistency is (1) within the range deemed acceptable to the State, and (2) meets professional standards. State publicly reports the estimate of decision consistency, and incorporates it appropriately into accountability decisions. State updates analysis and reporting of decision consistency at appropriate intervals. 	State Requirement
<p>1.5.12 What is the State's process for making valid AYP determinations?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> The State has a plan for validating AYP determinations and has allocated resources to address this area. 	

1.5: The SEA has implemented all required components as identified in its accountability workbook. (Sec. 1111(b)(2))	
SEA REVIEW	LEA REVIEW
<p>1.5.13 How has the State planned for incorporating into its definition of AYP anticipated changes in assessments?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • State has a plan to maintain continuity in AYP decisions necessary for validity through planned assessment changes, and other changes necessary to comply fully with NCLB. • State has a plan for including new public schools in the State Accountability System. • State has a plan for periodically reviewing its State Accountability System, so that unforeseen changes can be quickly addressed. 	<p>State Requirement</p>

1.5: The SEA has administered all required components as identified in its accountability workbook. (Sec. 1111(b)(2))

SEA REVIEW	LEA REVIEW
<p>1.5.14 Do the State's participation data indicate that all students in the tested grade ranges are included in the assessment system (e.g., students with disabilities, students with limited English proficiency, economically disadvantaged students, race/ethnicity, and migrant)?</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • Reports that specify the participation rates and the method of calculation for all students and for each subgroup in the assessment system. • State has a procedure to determine the number of absent or untested students (by subgroup and in the aggregate). • State has a procedure to determine the denominator (total enrollment) for the 95% calculation (by subgroup and aggregate). • Public schools and LEAs are held accountable for reaching the 95% assessed goal. <p><u>Interview</u></p> <ul style="list-style-type: none"> • What is the State's method for calculating participation rates in the State assessments for use in AYP determinations? 	<p><u>Documentation</u></p> <ul style="list-style-type: none"> • LEA can provide copies of guidance, memoranda, test administration manuals, etc., that document direction provided by the State for including required student subgroups in assessment administrations. • LEA has documentation of information and/or guidance provided to schools regarding participation rates. • LEA can document the participation of students by the required subgroups taking the required assessments for the district and by school (95% participation). • LEA can provide enrollment data against assessment participation for each required subgroup. • LEA can document any exemptions from assessment that have been permitted for students by the required subgroups for the district and by school.

1.6: The SEA has published an annual report card as required and an Annual Report to the Secretary. (§1111(h)(1))	
SEA REVIEW	LEA REVIEW
<p>1.6.1 The Annual State Report Card contains all of the required information –</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • Annual State Report Card as published on the SEA website or as distributed in print. • Required Information <ol style="list-style-type: none"> 1. Information, in the aggregate, on student achievement at each proficiency level on the state academic assessments disaggregated by race, ethnicity, gender, disability status, and migrant status, English proficiency and status as economically disadvantaged (where the minimum “n” has been met); 2. Comparison of the actual achievement levels of each group of students previously described to the State’s annual measurable objectives for each required assessment; 3. The percentage of students not tested, disaggregated by the same categories noted above by subject; 4. The most recent two-year trend in student achievement in each subject at each grade level, for grades in which assessment is required; 5. Aggregate information on any other indicator used by the State to determine AYP; 6. Graduation rates that are consistent with ED approved State definitions; 7. Information on leas regarding whether they made AYP, including the number and names of schools identified for school improvement; and 8. The professional qualifications of teachers in the State, including percentage of such teachers teaching with emergency or provisional credentials, and the percentage of classes not taught by highly qualified teachers, in the aggregate and disaggregated by high poverty compared to low poverty schools. 	<p>State Requirement</p>

1.6. The SEA has published an annual report card as required and an Annual Report to the Secretary. (§1111(h)(1))	
SEA REVIEW	LEA REVIEW
<p>1.6.2 SEA has procedures to monitor annual Local Educational Agency (LEA) Report Cards to ensure that information in the reports cards is complete and based on statistically valid and reliable data.</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • See minimal “n” in State accountability plan. • State audit check of LEA data 	State Requirement
<p>1.6.3 The Annual State Report to the Secretary contains all of the required information –</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • See most recent State Consolidated Report. • Required information <ol style="list-style-type: none"> 1. On the State’s progress in developing and implementing academic assessments as described in subsection (b)(3); 2. On the achievement of students on the academic assessments required under (b)(3), including the disaggregated results for the categories of students required in subsection (b)(2)(C)(v); 3. The acquisition of English proficiency by LEP students; 4. The number and names of all schools identified for school improvement under 1116(c), the reason why each school was identified, and the measures taken to address the achievement problems of such schools; 5. The number of students and schools that participated in public school choice and supplemental service programs and activities under this title; and 6. Information on the quality of teachers and the percentage of classes being taught by highly qualified teachers in the State, LEA and school. 	State Requirement

1.7: The SEA has ensured that LEAs have published annual report cards as required (§1111(h)(2))	
SEA REVIEW	LEA REVIEW
<p>1.7.1 The annual Local Educational Agency (LEA) Report Cards contain all of the required information for the LEA and each school served–</p>	<p><u>Documentation</u></p> <ul style="list-style-type: none"> District Report Card samples or prototype with complete set of school report cards for that LEA. Required information: <ol style="list-style-type: none"> Information, in the aggregate, on student achievement at each proficiency level on the State academic assessments disaggregated by race, ethnicity, gender, disability status, and migrant status; English proficiency and status as economically disadvantaged (where the minimum “n” has been met); Comparison of the actual achievement levels of each group of students previously described to the State’s annual measurable objectives for each required assessment; Information on how students served by the LEA achieved on the statewide academic achievement assessment compared to students in the State as a whole, The percentage of students not tested, disaggregated by the same categories noted above by subject; The most recent two-year trend in student achievement in each subject at each grade level, for grades in which assessment is required; Aggregate information on any other academic indicator used by the State to determine AYP; and aggregate information on any additional indicators used by the LEA to determine AYP; Graduation rates that are consistent with ED-approved State definitions; Information on the performance of the LEA regarding whether it made AYP and whether it has been identified for improvement, including the number and percent of schools identified for school improvement by name and how long the schools have been so identified; and The professional qualifications of teachers in the LEA, including percentage of such teachers teaching with emergency or provisional credentials, and the percentage of classes not taught by highly qualified teachers, in the aggregate and disaggregated by high poverty compared to low poverty schools.

1.7: The SEA has ensured that LEAs have published annual report cards as required (§1111(h)(2))	
SEA REVIEW	LEA REVIEW
<p>1.7.2 Individual School Reports are published on the web or distributed to parents in print form.</p>	<p><u>Documentation</u></p> <ul style="list-style-type: none"> Required Information: <ul style="list-style-type: none"> Within each LEA, individual school reports include : <ol style="list-style-type: none"> Whether the school has been identified for school improvement, and Information that shows how the school's student's achievement on the statewide academic assessments and other indicators of AYP compared to students in the LEA and the State.
<p>1.7.3 The LEA has publicly disseminated the information contained in the Annual LEA Report Cards to all schools in the LEA and to all parents of children attending the LEA's schools in a form and to the extent practicable in the language that parents can understand.</p>	<p><u>Documentation</u></p> <ul style="list-style-type: none"> District Report Card samples; dissemination plan and timeline.
<p>1.7.4 LEA has provided, to parent/guardian of each child attending any school, information on the level of achievement of the child in each of the State academic assessments.</p>	<p><u>Documentation</u></p> <ul style="list-style-type: none"> Student Assessment Report samples, dissemination plan and timeline.

1.8: The SEA indicates how funds received under Grants for State Assessments and related activities (§6111) will be or have been used to meet the 2005-06 and 2007-08 assessment requirements of NCLB.	
SEA REVIEW	LEA REVIEW
<p>1.8.1 State has indicated how 6111 funds will be used to meet the SY 05-06 and 07-08 assessment requirements of NCLB.</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> ED approved State's plan for using 6111 funds and progress towards meeting this requirement can be documented by the State. State can document what part of 6111 funds is being spent on assessment development and what part is being spent on 6111 part B areas. 	State Requirement
OR	
<p>1.8.2 State has completed the development of assessments required by SY 05-06 and 07-08 and is using 6111 funds to support implementation of the NCLB standards and assessment requirements.</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> State can document that assessment development has been completed and how 6111 funds are being used to support implementation based on 6111 part B guidelines. 	State Requirement

1.9: SEA ensures that LEAs meet all requirements for identifying and assessing the English language proficiency of limited English proficient students.	
SEA REVIEW	LEA REVIEW
<p>1.9.1 Language survey identifies:</p> <ul style="list-style-type: none"> • Languages other than English present in student population, and • Languages for which yearly academic assessments are needed. <p>•</p>	<p><u>Documentation</u></p> <ul style="list-style-type: none"> • Home language survey, OELA report, or Consolidated application.
<p>1.9.2 SEA plans to select/develop English language proficiency test(s) of oral language, reading and writing. If multiple tests are permitted, the State will determine comparability sufficient to aggregate results at the State level.</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> ▪ State has established and disseminated an operational definition of English proficiency consistent with the test(s) adopted. State has developed a strategy to determine comparability and aggregate results across different tests if multiple tests are adopted. 	
	<p><u>LEA Implementation – Components</u></p> <p>1.9.3 ELP tests administered annually in grades K-12 by LEAs to all students with limited English proficiency in the schools served by the State.</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • LEA administers an ELP assessment that is approved by SEA to all LEP students.

Title I, Part A Instructional Support Indicators

<p>2.1: The SEA designs and implements procedures that ensure the hiring and retention of qualified paraprofessionals and ensure that parents are informed of educator credentials as required. For more detail about requirements, see Sec. 1111 (h)(6)(A) Sec. 1119 (c) – (l) 34 CFR Part 200 §200.58 – 200.61</p>	
SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence that the SEA has a system in place to ensure that all instructional paraprofessionals are qualified by the end of the 2005-2006 school year • Evidence that the SEA monitors the status of paraprofessionals meeting qualification requirements. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • SEA discusses the guidance it provides to LEAs regarding the process of qualifying all paraprofessionals by the end of the 2005-06 school year. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence that Title I instructional paraprofessionals hired since January 8, 2002 meet statutory qualification requirements. • Evidence that the LEA has a system in place to ensure that Title I instructional paraprofessional hired before January 8, 2002 meet statutory requirements by the end of the 2005-06 school year. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • LEA discusses its process for ensuring that all paraprofessionals are qualified by the end of the 2005-06 school year.

2.2: The SEA has established a statewide system of support that provides, or provides for, technical assistance to LEAs and schools as required.

See critical element 2.4 for additional technical assistance requirements.

For more detail about requirements, see

Sec. 1111(c)(3) – (5); Sec. 1111(b)(8)(D); Sec. 1117(a) – (b)

34 CFR Part 200; §200.40

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence that the SEA has developed a statewide system of support and improvement for all LEAs and schools that : <ul style="list-style-type: none"> • Adheres to statutory priorities, and • Works with regional technical assistance centers and regional educational labs as appropriate • Evidence that the statewide system of support and improvement includes the following approaches: <ul style="list-style-type: none"> • Effective school support teams who are knowledgeable about scientifically based research and practices; and • Distinguished teachers and principals from successful schools. • Documentation that the school support teams provide support to schools including analyzing the design and operation of the instructional program and develop recommendations for improving student performance. • Evidence that the SEA has established an academic achievement awards program. • Evidence that the SEA recognizes distinguished schools. • Evidence that the SEA has assisted LEAs in developing or identifying high quality effective curricula aligned with State academic achievement standards and disseminated such curricula to each LEA and school within the state. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • SEA explains how it has created and implemented a statewide system of support and improvement for LEAs and schools. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence that representatives of the statewide system of support have provided technical assistance to schools in corrective action, and other schools in need of improvement. <p>.</p> <p><u>Interview:</u></p> <ul style="list-style-type: none"> • LEA discusses the impact of the SEA system of support and improvement and how it aligns with district technical assistance.

2.3: The SEA ensures that the LEA and schools meet parental notice requirements and parental involvement requirements.

For more detail about requirements, see

Sec. 1118 (a) – (h); Sec. 1111(c)(14); Sec. 1111(d); Sec. 1116(a)(1)(D) 1116(c)(6); 1116(c)(10)(E)

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence of SEA guidance to LEAs on parental notice and parental involvement requirements. • Evidence that the SEA has reviewed the LEA's parental notification letters for the completeness of information required for school improvement status, school choice, and SES. • Evidence that the SEA notifies parents if an LEA is identified for improvement or corrective action, the reasons for that identification, and how parents can participate in up-grading the quality of the LEA. • Evidence that the SEA has provided guidance to LEAs regarding "parent right to know" requirements. • Evidence that the SEA has encouraged LEAs and schools to use Title I funds to offer family literacy services if the LEA determines that a substantial number of students have parents with low levels of literacy and without a secondary school diploma or its recognized equivalent. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • SEA discusses findings of LEA review of parental notification letters and parental involvement actions and activities and schools. • SEA discusses its guidance to LEAs regarding parental notices and parental involvement requirements and how it monitors the LEA implementation of requirements. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • LEA parental notification letters for: <ul style="list-style-type: none"> • School improvement status • Public School Choice • SES • LEA parent involvement policy • Annually informing parents that they may request and the LEA will provide information regarding the professional qualifications of their children's teachers, and of paraprofessionals who provide instructional services to their children • Informing parents if their child is assigned to or being taught by a teacher in a core academic subject who is not highly qualified for 4 or more consecutive weeks • Copies of LEA and school written parental involvement policies and evidence that each is updated periodically. • Evidence that school parent involvement policies have been distributed to parents • Copies of written school-parent compacts. • Evidence that schools hold an annual meeting to inform participating parents about Title I programs. • Evidence that the LEA and schools review the effectiveness of school parental involvement activities. • Evidence that LEA and schools have carried out the six requirements to build parents' capacity to be involved in school. • Evidence that the LEA and schools have informed parents about the existence of a parent resource center, if one exists. • Evidence that LEAs communicate with parents in multiple languages, in writing and orally, as appropriate.

2.3: The SEA ensures that the LEA and schools meet parental notice requirements and parental involvement requirements.

For more detail about requirements, see

Sec. 1118 (a) – (h); Sec. 1111(c)(14); Sec. 1111(d); Sec. 1116(a)(1)(D)

SEA REVIEW	LEA REVIEW
	<p><u>Interview:</u></p> <ul style="list-style-type: none">• LEA discusses SEA guidance and any SEA procedures and/or policies on parental notices and parent involvement requirements.• LEA discusses SEA technical assistance, programs, activities, and training that:<ul style="list-style-type: none">• Build LEA and school capacity to build parent involvement.• Build parents' capacity to be involved in school.• LEA articulates how it addresses the six required activities at the LEA and school designed to build parents' capacity to be involved in school.• LEA explains process of developing/revising parental involvement policy, including timeline and method used.• LEA discusses how it reviews schools' parent policies and school-parent compacts for completeness of information required under ESEA.

2.4: The SEA ensures that schools and LEAs identified for improvement, corrective action, or restructuring have met the requirements of being so identified.

See critical element 2.2 for additional technical assistance requirements.

For more detail about requirements see

Sec. 1116(b)(1)(B); Sec. 1116(b)(3); Sec. 1116(b)(4) – (6); Sec. 1116(b)(7)(C)(ii); Sec. 1116(b)(14)(B); Sec. 1116 (c)(1); Sec. 1116(c)(9); Sec. 1116(c)(10)(B)(iii)

34 CFR Part 200; §200.36-200.43

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Written guidance to LEAs and schools on requirements for schools and LEAs identified for improvement, corrective action, or restructuring. • Written guidance to LEAs and schools on the required components of a school or LEA improvement plan . • Evidence that the SEA ensures that LEAs provide, or provide for, technical assistance for schools identified for improvement, corrective action, or restructuring. • Evidence that SEA provides technical assistance, if requested, for schools identified for improvement, corrective action or restructuring, including developing or revising improvement plans. • Evidence that SEA provides technical assistance to LEAs identified for improvement or corrective action. • Evidence that the SEA takes appropriate action if an LEA does not carry out its responsibilities to schools identified. • Evidence that the SEA monitors LEA implementation of requirements for school improvement, corrective action, or restructuring. • Evidence that the SEA annually reviews the progress of each LEA to determine that the LEA is carrying out its responsibilities under sections 1117 (school support and recognition), 1118 (parent involvement), and 1119 (qualifications for teachers and paraprofessionals). • Evidence that the SEA publicizes and disseminates, as part of the annual review, the results pertaining to sections 1117, 1118, and 1119. • Evidence that the SEA provides technical assistance to LEAs identified for improvement, or corrective action,, as required <p><u>Interview:</u></p> <ul style="list-style-type: none"> • SEA discusses annual review of progress of LEA's implementation of • SEA discusses process for supporting schools in improvement, corrective action, or restructuring, and process for ensuring that LEAs fulfill their responsibilities in these areas. • SEA discusses support for LEAs identified for improvement, or corrective action, restructuring and means of guiding and monitoring LEAs during these processes. • SEA discusses the process for monitoring the implementation of LEA and school improvement plans. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence that the LEA applies required interventions for schools identified for improvement, corrective action, or restructuring. • Evidence that LEA has provided or provided for technical assistance grounded in scientifically based research to schools in improvement, corrective action, or restructuring. • Evidence that the LEA provides identified schools with guidance in developing or revising school improvement plans as required. • Evidence that the LEA peer reviews school improvement plans, as required. • Evidence that the LEA monitors the implementation of school improvement plans. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • LEA demonstrates thorough understanding of requirements for school identified for improvement, corrective action, or restructuring and or LEA s identified for improvement or corrective action. • LEA articulates how it supports schools with developing and implementing school improvement plans. • LEA explains the progress review process used with schools identified for improvement, corrective action, or restructuring.

2.5: The SEA ensures that requirements for public school choice are met.

For more detail about requirements, see
 Sec. 1116(b)(1)(D) and (E); Sec. 1112(g)(4); 34 CFR Part 200; §200.44

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence that SEA has established procedures to implement and monitor public school choice provisions. • Guidance provided to LEAs outlining requirements for implementing public school choice. • Number and names of LEAs and schools offering public school choice. • Numbers of students transferring schools under the public school choice option. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • SEA understands of public school choice requirements. • SEA is aware of potential problems related to choice implementation and has addressed them. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • List of schools identified for improvement, corrective action, or restructuring that are required to offer public school choice. • LEA guidance to identified schools regarding the implementation of public school choice. • Number of students eligible for transfer, and the number of actual transfers by school. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • LEA discusses requirement for offering school choice and explains process used to assist parents in accessing choice if requested. • LEA discusses the levels of participation in school choice. • LEA discusses parent inquiries and complaints regarding public school choice, and their resolution.

2.6: The SEA ensures that requirements for the provision of supplementary educational services (SES) are met.

For more detail about requirements, see
Sec. 1116(e); 34 CFR Part 200; §200.45 – 47

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence that SEA annually notifies potential SES providers of the opportunity to participate. • Evidence of objective criteria for selecting providers as required. • Evidence that the SEA has consulted with LEAs, parents, teachers, and the public to promote maximum participation by SES providers. • Up to date list of approved providers and evidence that this list has been distributed to LEAs. • Written explanation of how SEA monitors providers and how approval is withdrawn if justified. • Documentation of application for, and approval of, LEA waivers of SES requirements, if applicable. • Numbers of students eligible for, and participating in, supplemental educational services by district and school. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • SEA discusses requirements for providing SES. • SEA discusses selection and use of SES providers. • SEA discusses issues related to the provision of SES and how those issues are being addressed. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence that the LEA has complied with the required priority for providing SES if funds to serve all eligible students are insufficient. • Sample of agreement/contract between LEA and selected providers that meets statutory requirements. • List of schools offering supplemental educational services and number of students eligible and participating at each school. <p>Note: Evidence of notices to parents that contain all the required information is reviewed under Indicator 2.3.</p> <p><u>Interview:</u></p> <ul style="list-style-type: none"> • LEA discusses its implementation and monitoring of SES for eligible students. • LEA describes the process for assisting parents, when requested, in choosing SES providers.

2.7: The SEA ensures that LEAs and schools develop schoolwide programs that use the flexibility provided to them by law to improve the academic achievement of all students in the school.

For more detail about requirements, see
Sec. 1114; 34 CFR Part 200; §200.26 – 28

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence that the SEA provides guidance to LEAs on the intent, purpose, and processes of schoolwide programs and program requirements, including: <ul style="list-style-type: none"> • Conducting needs assessment • Comprehensive planning • Combining program funds • Addressing the intent and purpose of programs whose funds are consolidated • Developing or revising schoolwide plans • Program and plan evaluation • Evidence that the SEA provides technical assistance and support to LEAs and schools developing schoolwide programs in the areas of needs assessment, comprehensive planning, implementation, and evaluation. • Evidence that the SEA has reduced barriers to consolidation of funds in schoolwide programs. • Evidence that the SEA maintains a record of schoolwide program schools and monitors the development, implementation, and evaluation of these programs. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • SEA articulates the system of support and technical assistance it provides to LEAs and schools and during schoolwide program planning and implementation. • SEA demonstrates knowledge about which programs' funds may be combined in schoolwide programs, which are exempt, and which can be included with conditions. • SEA discusses the processes it uses to ensure that schoolwide programs are comprehensively developed, evaluated annually, and revised on an ongoing basis. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence that LEA provides guidance to schools about the development, implementation, and evaluation of schoolwide programs and program requirements. • Evidence that LEA provides technical assistance and support to schools developing schoolwide programs in the areas of needs assessment, comprehensive planning, implementation, and evaluation. • Evidence that schoolwide programs are reviewed and evaluated annually, and revised accordingly. • Copies of schoolwide program plans that include the ten required components. • Evidence that indicates which program funds have been consolidated in the schoolwide program and how the intent and purposes of the individual programs consolidated are addressed. • Evidence that the schoolwide program is designed to upgrade the educational program for all students, but especially those most at risk of not meeting State standards. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • LEA demonstrates understanding of schoolwide programs as a whole-school reform strategy. • LEA and school discuss how the schoolwide program serves all students. • LEA and school are knowledgeable about the development and implementation of schoolwide programs, including needs assessment, comprehensive planning, evaluation, and revision of plans. • LEA explains how schools consolidate funds in schoolwide program schools. • LEA discusses how it monitors schoolwide programs.

2.8: The SEA ensures that LEA targeted assistance programs meet all requirements.

For more detail about requirements, see
Sec. 1115

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence that SEA has provided guidance to LEAs on requirements of targeted assistance programs • Evidence that SEA has monitored LEAs to ensure that targeted assistance programs comply with statutory purpose and requirements <p><u>Interview:</u></p> <ul style="list-style-type: none"> • SEA staff is knowledgeable about the creation and maintenance of targeted assistance programs at the LEA and school level. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence that the LEA has established targeted assistance programs that address statutory purposes and meet requirements, including <ul style="list-style-type: none"> • Use of effective instructional methods and strategies that strengthen the core academic program of the school, • Correctly identifying students for participation, • Giving primary consideration to providing extended learning time for students served, • Providing an accelerated high quality curriculum, and • Minimizing the removal of children from the regular classroom during regular school hours. • Evidence that LEA ensures that targeted assistance program planning coordinates with and supports the regular education program in schools. • Evidence that the LEA promotes the integration of staff supported with targeted assistance funds into the regular school program, including professional development . <p><u>Interview:</u></p> <ul style="list-style-type: none"> • LEA and targeted assistance schools understand the intents and purposes of targeted assistance program goals and requirements. • LEA and targeted assistance schools describe the delivery of targeted assistance services.

Title I, Part A Fiduciary Indicators

<p>3.1 Within State Allocations, Reallocations, and Carryover. The SEA complies with—</p> <ul style="list-style-type: none"> ▪ The procedures for adjusting ED-determined allocations outlined in §§200.70 – 200.75 of the regulations. ▪ The procedures for reserving funds for school improvement, State administration, and (where applicable) the State Academic Achievement Awards program. ▪ The reallocation and carryover provisions in section 1126(c) and 1127 of Title I statute. <p>[See Department of Education's guidance of May 23, 2003 on adjusting ED Title I, Part A allocations to LEAs]</p>	
SEA REVIEW	LEA REVIEW
<p><u>Documentation</u></p> <ul style="list-style-type: none"> • Procedures showing how State adjusts ED allocations to account for the creation of new school districts and district boundary changes and to reserve funds for school improvement activities, State administration, and (where applicable) the academic achievement awards program. • Procedures showing how the State adjusts ED allocations to account for existing, as well as new and expanding, charter school LEAs. • Evidence showing that the SEA has reserved 4% of the State's Title I, Part A allocation for section 1003(a)-(e) school improvement activities, and allocated 95% of the amount reserved to LEAs with schools that have been identified for improvement, corrective action, or restructuring. • Evidence that no LEA received a Title I amount less than the amount received in the prior year because of the school improvement reserve. • For State administration, evidence showing that the SEA has reserved not more than 1% of its Title I, Part A allocation for this purpose. (For small States, the maximum reserve is \$400,000 if 1% of its Title I, Parts A, C, and D allocations are less than \$400,000). • If a State reserves funds for the State Academic Achievement Awards program, a record of the amount reserved for this purpose and evidence that the amount reserved did not exceed more than 5% of the amount in excess of the Title I, Part A amount the State received in the preceding year. • Record of final basic, concentration, targeted, and education finance incentive grants to LEAs after SEA has adjusted ED allocations. • Evidence that LEAs have full access to Title I funds for the full 15 month availability period (until September 30). • SEA guidance or instructions to LEAs related to when to calculate carryover. • Evidence that, if the SEA has made an exception to the 15 percent carryover limitation on carryover of funds, it has determined that the LEA request is reasonable and necessary or supplemental appropriations for Title I, Part A become available. 	<p><u>Documentation</u></p> <ul style="list-style-type: none"> • Date that LEA receives notification of its allocation from the SEA

3.1 Within State Allocations, Reallocations, and Carryover. The SEA complies with—

- The procedures for adjusting ED-determined allocations outlined in §§200.70 – 200.75 of the regulations.
- The procedures for reserving funds for school improvement, State administration, and (where applicable) the State Academic Achievement Awards program.
- The reallocation and carryover provisions in section 1126(c) and 1127 of Title I statute.

[See Department of Education's guidance of May 23, 2003 on adjusting ED Title I, Part A allocations to LEAs]

SEA REVIEW	LEA REVIEW
<p><u>Interview</u></p> <ul style="list-style-type: none">• SEA staff understands the process used to adjust ED-determined allocations.• SEA staff discusses technical assistance to LEAs regarding allocations.• SEA can explain the procedure it uses for ensuring that charter schools that are LEAs receive the Title I funding to which they are entitled.• SEA staff can explain how State- reserved funds for school improvement adjusts LEA allocations, and establishes criteria for awarding at least 95% of school improvement funds to LEAs with schools identified as needing improvement.• The SEA can explain how it reserves funds for State administration and State Academic Achievement Awards program and whether in reducing LEA allocations to reserve funds for these purposes, the SEA (1) ensures that no LEA receives less than its hold-harmless amount or (2) reduces each LEA's allocation proportionately, regardless of the affect such a reduction would have on the district's hold-harmless guarantee.• SEA staff can describe policy/process for reallocation and provide written policy.• SEA staff understands that SEA cannot grant a carryover waiver to an LEA more than once every three years.• SEA staff can explain how the SEA ensures that LEAs have full access to Title I funds for the full 15 month availability period (until September 30).• SEA staff can discuss the SEA controls that are in place to ensure that, after September 30, LEAs are not allowed to use any prior year funds that exceed the 15 percent carryover limitation unless they have an approved waiver.	

3.2 LEA Plan. The SEA ensures that its LEAs comply with the provision for submitting an annual application to the SEA and revising LEA plans as necessary to reflect substantial changes in the direction of their program.

Sec.1112

SEA REVIEW	LEA REVIEW
<p><u>Documentation</u></p> <ul style="list-style-type: none"> • Review and approval process for LEA plans, including procedures. (Review checklists, established schedule). • Resolution procedures for unapproved plans. • Guidance to LEAs on local application preparation and submission of plan amendments. • Technical assistance provided to LEAs on annual plan requirements. • Evidence of timely plan approval and release of funds. <p><u>Interview</u></p> <ul style="list-style-type: none"> • Staff explains the process for review and approval of local applications (annual plans), amendments to plans and release of funds to LEAs. • Staff discusses technical assistance provided to LEAs regarding the annual plan process. • Staff explains the process for reviewing the LEA plan to determine if activities are in accordance with sections 1118 (Parental Involvement) and 1119, (1112(e)(3)) (Professional Development). 	<p><u>Documentation</u></p> <ul style="list-style-type: none"> • Most recently approved annual plan from the LEA, which includes: <ul style="list-style-type: none"> • Needs Assessment • Allocation amount, budget information and required set-asides • A description of the poverty criteria used to select school attendance areas • Record of schools' AYP. • Evidence that the plan included input from teachers, principals, administrators (including administrators of other programs described in Title I, Part A) and other appropriate school personnel, and parents of children in schools receiving Title I services. <p><u>Interview</u></p> <ul style="list-style-type: none"> • Staff describes process for preparation and submission of annual plans to SEA, including technical assistance provided on the process. • Staff describes process for preparation and submission of plan amendments. • Staff demonstrates understanding of allocation formulas. • Staff discusses technical assistance to schools regarding allocations. • Staff demonstrates understanding of the connection between school improvement and effective use of funds. • Staff provides evidence that the plan included input from teacher, principals, administrators (including administrators of programs described in other parts of Title I, Part A) and other appropriate school personnel, and w/parents of children in schools receiving Title I, Part A services.

3.3 Within District Allocation Procedures. LEA complies with the requirements in sections 1113, 1116, & 1118 of the Title I Statute and §§200.77 and 200.78 of the regulations with regard to: (1) Reserving funds for the various set-asides either required or allowed under the statute, & (2) Allocating funds to eligible school attendance areas or schools in rank order of poverty based on the number of children from low-income families who reside in an eligible attendance area.

[See Department of Education's August 2003 guidance: LEA Identification and Selection of School Attendance Areas and Schools and Allocation of Title I Funds to Those Areas and Schools and the October 17, 2003 guidance: Title I Services to Eligible Private School Children.]

SEA REVIEW	LEA REVIEW
<p><u>II. Rank Ordering and Allocation Procedures</u></p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> SEA guidance or instructions for rank ordering schools. SEA procedure(s) to ensure that LEAs meet requirements related to rank order. <p><u>Interview</u></p> <ul style="list-style-type: none"> SEA staff can describe the guidance or instructions to LEAs for rank ordering schools. SEA staff can explain the process that the SEA uses to ensure compliance with rank order requirements. 	<p><u>II. Rank Ordering and LEA Selection of Participating Schools</u></p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> Rank Order <ul style="list-style-type: none"> Evidence that, for each attendance area, the percentage of poverty is correctly calculated. Evidence that the feeder pattern, if applicable, is calculated correctly. Evidence that charter schools are included in the ranking. Evidence that, if funds are not available to serve all eligible schools within an eligible school attendance area, schools that have exceeded 75 percent poverty have been identified and ranked from highest percentage of poverty to lowest percentage of poverty. Evidence that, once schools with poverty rates above 75 percent have been served, if there are funds available to serve additional schools, the additional schools have been ranked from highest percentage of poverty to lowest percentage of poverty OR have been ranked by grade span. Evidence that the LEA is using the same measure of poverty for identifying eligible school attendance areas, determining the ranking of each area and determining the allocation for each area. Evidence that the LEA ranks school attendance areas based on the percentage (not the number) of low-income children counted. Calculating Per Pupil Allocation (PPA) Amounts <ul style="list-style-type: none"> Total Amount of Title I, Part A funds available for distribution to schools \$_____ Evidence that the LEA has allocated funds to participating school attendance areas in rank order. Evidence that the LEA is correctly applying the 125 percent if they are serving schools below 35% poverty. <p><u>Interview</u></p> <p>LEA staff demonstrate an understanding of:</p> <ul style="list-style-type: none"> The allocation formula including the procedures for rank ordering school attendance areas and schools and determining which attendance areas or schools are eligible for Title I. The ranking procedures without regard to grade spans for schools with a poverty rate of 75 percent and above. The requirement to exclude pre-kindergarten children from the poverty count of each school.

3.3 Within District Allocation Procedures. LEA complies with the requirements in sections 1113, 1116, & 1118 of the Title I Statute and §§200.77 and 200.78 of the regulations with regard to: (1) Reserving funds for the various set-asides either required or allowed under the statute, & (2) Allocating funds to eligible school attendance areas or schools in rank order of poverty based on the number of children from low-income families who reside in an eligible attendance area.

[See Department of Education's August 2003 guidance: LEA Identification and Selection of School Attendance Areas and Schools and Allocation of Title I Funds to Those Areas and Schools and the October 17, 2003 guidance: Title I Services to Eligible Private School Children.]

SEA REVIEW	LEA REVIEW
<p><u>III. LEA Reservation of Funds</u></p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> SEA guidance or instructions to LEAs related to reserving funds for various required or allowed reservations. SEA procedure(s) for ensuring that LEAs meet reservation requirements annually. SEA procedures to ensure that an LEA has fully met parental demand for choice-related transportation and/or supplemental educational services before it may reallocate funds to other activities. SEA guidance or instructions to LEAs related to calculating the per-pupil funding cap for supplemental educational services. <p><u>Interview</u></p> <ul style="list-style-type: none"> SEA staff can describe the guidance or instructions to LEAs for reserving funds for various required or allowed reservations. SEA staff can explain the process that the SEA uses to ensure compliance with requirements related to reservations. SEA staff can explain the SEA procedures to ensure that, from funds reserved for parental involvement and professional development, LEAs have correctly calculated the amount for services to private school families and teachers. SEA staff can explain the SEA procedures to ensure that an LEA has fully met parental demand for choice-related transportation and/or supplemental educational services before it may reallocate funds to other activities. SEA staff can explain the process for calculating the per-pupil funding cap for supplemental educational services. 	<p><u>III. LEA Reservation of Funds</u></p> <p><u>Documentation</u></p> <p>Evidence that the LEA has reserved funds as are reasonable and necessary to provide services comparable to those provided to children in participating school attendance areas to serve:</p> <ul style="list-style-type: none"> Homeless Children <ul style="list-style-type: none"> Evidence that the LEA has reserved funds to serve homeless students who do not attend participating schools. Children in local institutions for neglected and delinquent children <ul style="list-style-type: none"> Evidence that the LEA has reserved funds to serve children in local institutions for neglected children; and, if appropriate, children in local institutions for delinquent children; and, neglected and delinquent children in community-day programs. <p>Evidence that the LEA has reserved funds for:</p> <ul style="list-style-type: none"> <u>I</u>ncentives and rewards <ul style="list-style-type: none"> Evidence that the LEA has reserved funds to provide, where appropriate, financial incentives and rewards to teachers who serve students in Title I schools identified for improvement, corrective action, and corrective action. Choice-Related Transportation <ul style="list-style-type: none"> Evidence that the LEA, if appropriate, has reserved an amount equal to 20 percent of its Title I, Part A allocation on choice and SES, assuming sufficient demand unless the LEA meets these requirements with non-Title I funds. Evidence that if demand from parents for transportation exceeds 5 percent, the LEA is spending at least 5 percent on transportation. Evidence that the LEA has fully met parental demand for choice-related transportation and/or supplemental educational services before it reallocates funds to other activities. LEA staff can provide documentation related to the amount of funding that has been expended for choice-related transportation and supplemental educational services as of _____ (date to be determined by USDE staff.)

3.3 Within District Allocation Procedures. LEA complies with the requirements in sections 1113, 1116, & 1118 of the Title I Statute and §§200.77 and 200.78 of the regulations with regard to: (1) Reserving funds for the various set-asides either required or allowed under the statute, & (2) Allocating funds to eligible school attendance areas or schools in rank order of poverty based on the number of children from low-income families who reside in an eligible attendance area.

[See Department of Education's August 2003 guidance: LEA Identification and Selection of School Attendance Areas and Schools and Allocation of Title I Funds to Those Areas and Schools and the October 17, 2003 guidance: Title I Services to Eligible Private School Children.]

SEA REVIEW	LEA REVIEW
<p>IV. Equitable Services for Private School Participants</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> Procedures that the SEA uses to ensure that LEAs have correctly calculated equitable services for services to private school participants, their teachers and families. 	<p>III. LEA Reservation of Funds</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> Supplemental Educational Services <ul style="list-style-type: none"> Evidence that the LEA, if appropriate, has reserved an amount equal to 20 percent of its Title I, Part A allocation on choice and SES, assuming sufficient demand unless the LEA meets these requirements with non-Title I funds. Evidence that if demand from parents for supplemental education services exceeds 5 percent, the LEA is spending at least 5 percent on supplemental educational services. Evidence that the LEA has fully met parental demand for choice-related transportation and/or supplemental educational services before it reallocates funds to other activities. Evidence that the per-pupil funding cap has been correctly calculated. LEA staff can provide documentation related to the amount of funding that has been expended for choice-related transportation and supplemental educational services as of _____ <i>(date to be determined by USDE staff.)</i> Professional Development <ul style="list-style-type: none"> Evidence that the LEA has reserved at least 5 percent of its allocation (unless a lesser amount is needed) to provide professional development activities to ensure that teachers who are not highly qualified become highly qualified. <p>IV. Equitable Services for Private School Participants</p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> Evidence that the LEA has correctly calculated equitable services for services to private school participants, their teachers and families.

3.3 Within District Allocation Procedures. LEA complies with the requirements in sections 1113, 1116, & 1118 of the Title I Statute and §§200.77 and 200.78 of the regulations with regard to: (1) Reserving funds for the various set-asides either required or allowed under the statute, & (2) Allocating funds to eligible school attendance areas or schools in rank order of poverty based on the number of children from low-income families who reside in an eligible attendance area.

[See Department of Education's August 2003 guidance: LEA Identification and Selection of School Attendance Areas and Schools and Allocation of Title I Funds to Those Areas and Schools and the October 17, 2003 guidance: Title I Services to Eligible Private School Children.]

SEA REVIEW	LEA REVIEW
<p><u>V. Additional Reservation of Funds for LEA and School Improvement</u></p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> SEA guidance or instructions to LEAs related to reservations for LEA and school improvement. SEA guidance or instructions to LEAs to inform them that the equitable services provision does not apply to reservations related to LEA and school improvement. SEA procedures for ensuring that LEAs meet reservation requirements related to LEA and school improvement annually. <p><u>Interview</u></p> <ul style="list-style-type: none"> SEA staff can describe the process that the SEA uses for ensuring that LEAs meet reservation requirements related to LEA and school improvement annually. SEA staff can describe the process that the SEA uses to inform it that the equitable services provision does not apply to reservations related to LEA and school improvement. 	<p><u>IV. Equitable Services for Private School Participants</u></p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> The LEA must reserve an equitable portion of its applicable reservations (including carryover if applicable) for participating private school children, their teachers and families. <ul style="list-style-type: none"> Proportion of Reservation _____. Amount reserved for Instructional Services – Private School Participants _____. Amount reserved for Parental Involvement – Families of Private School Participants _____. Amount reserved for Professional Development – Teachers of Private School Participants _____. <p><u>Interview</u></p> <ul style="list-style-type: none"> LEA staff can explain the calculations used to determine the equitable portion of its applicable reservations (including carryover) for participating private school children, their teachers and families <p><u>V. Additional Reservation of Funds for LEA and School Improvement</u></p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> Evidence that, if the LEA has been identified for improvement, it has reserved at least 10 percent of its allocation for professional development activities (this may include funds reserved at the school level for those schools identified for improvement). Evidence that Title I schools that have been identified for improvement have reserved at least 10 percent of their allocation for professional development activities. Evidence that the LEA has not provided equitable services from reservations related to LEA and school improvement.

3.4 Fiscal Requirements Maintenance of Effort. The SEA complies with the maintenance of effort (MOE) provisions of Title I. Sections 1120A (a) and 9021 of the ESEA.

SEA REVIEW	LEA REVIEW
<p><u>Documentation</u></p> <ul style="list-style-type: none"> • Procedures for determining maintenance of effort (MOE) including funds to be excluded from MOE calculations). • MOE report comparing fiscal effort of first preceding year with second preceding year. • For each LEA that does not maintain effort the SEA calculations to determine how much the LEA's allocation for each covered program is reduced. <p><u>Interview</u></p> <ul style="list-style-type: none"> • Staff understands which types of funds are to be included and excluded when determining maintenance of effort. • Staff understands that an LEA's allocations under Title I or the other covered programs must be reduced by the percentage its education expenditures from State and local sources in the comparison year falls less than 90% of its expenditures in the preceding year. • Staff understands maintenance of effort can be determined by using either fiscal effort per student or aggregate expenditures. • Staff understands that the Secretary may waive maintenance of effort requirements for the following reasons: <ul style="list-style-type: none"> • Exceptional or uncontrollable circumstances such as a natural disaster; or • A precipitous decline in financial resources at the lea. 	<p><u>Documentation</u></p> <p><i>(Usually done at the SEA level. If maintenance of effort is calculated at the LEA, provide the same evidence as requested from the State, in addition to SEA guidance on procedures for calculating maintenance of effort.)</i></p>

3.4 Fiscal Requirements. Comparability The SEA ensures that the LEA complies with the comparability provisions of Title I. Section 1120A(c) of the ESEA

SEA REVIEW	LEA REVIEW
<p><u>Documentation</u></p> <ul style="list-style-type: none"> • Sample of Comparability reports comparing Title I schools to non-Title I schools reported to SEA at least biennially • Guidance, State policy issued to LEAs that describes procedures for calculating comparability • Evidence that the SEA monitors for the comparability calculations at least every two years. <p><u>Interviews</u></p> <ul style="list-style-type: none"> • Staff understands Title I schools must be comparable using one of several approved methods for computing comparability. • Staff understands schools must be comparable in order to receive Title I funds, thus calculations ensuring comparability must be computed annually. • Staff understands comparability must be reported to the SEA at least biennially. • Staff understands that in cases where Title I schools are not comparable to non-Title I schools, the LEA must make adjustments in staffing or other resources in order to make Title I schools comparable or the Title I account must be reimbursed. • Staff understands that the LEA may exclude State and local funds expended for bilingual education for LEP/ELL children and excess costs of providing services to children w/disabilities (as determined by LEA). • Staff understands the comparability requirement does not apply to an LEA that does not have more than one building for each grade span. 	<p><u>Documentation</u></p> <ul style="list-style-type: none"> • Annual comparability calculations for Title I schools and non-Title I schools showing that the resources Title I schools receive from local and State funds are comparable to those received by non-Title I schools. • In cases where Title I schools are not comparable, documentation showing adjustments to the allocation of resources that LEA made to ensure that Title I and non-Title I schools are comparable. <p><u>Interviews</u></p> <ul style="list-style-type: none"> • LEA staff understands Title I schools must be comparable using one of several approved methods for computing comparability. • LEA staff understands schools must be comparable in order to receive Title I funds, thus calculations ensuring comparability must be computed annually. • Staff understudy comparability must be reported to SEA at least biennially, and calculations done annually. • Staff understands that, in cases where Title I schools are not comparable to non-Title I schools, the LEA must make adjustments in staffing or other resources to make Title I schools comparable or reimburse the Title I program to the extent that Title I schools are not comparable. • The LEA has a definition for the positions considered to be instructional staff. • Staff understands that the LEA may exclude State and local funds expended for bilingual education for LEP/ELL children and excess costs of providing services to children w/disabilities (as determined by LEA). • The staff understands the comparability requirement does not apply to an LEA that does not have more than one building for each grade span.

3.4 Fiscal Requirements Supplement Not Supplant. The SEA ensures that Title I funds are used only to supplement or increase non-Federal sources used for the education of participating children and do not supplant funds from non-Federal sources.

Sec. 1120A(b) of the ESEA
 Sec. 1114(a)(2)(B) of the ESEA
 Sec. 1115(b)(3) of the ESEA
 Sec. 1116 of the ESEA

SEA REVIEW	LEA REVIEW
<p><u>Documentation</u></p> <ul style="list-style-type: none"> • Written SEA guidance to LEAs on supplement not supplant requirements. • Evidence that questions or inquiries from LEAs and schools regarding supplement not supplant issues have been addressed adequately. • Evidence that the SEA has monitored expenditures of LEAs to ensure that funds are used to supplement, and not supplant State and local funds. • Budget records. • Personnel records. • Inventory records. <p><u>Interviews</u></p> <ul style="list-style-type: none"> • Staff describes statutory requirements. • Staff describes technical assistance provided to LEAs regarding this requirement. 	<p><u>Documentation</u></p> <ul style="list-style-type: none"> • LEA approved budget and records of expenditures of Title I funds at the district level. • Record of schoolwide expenditures that verifies that funds have not supplanted non-Federal funds. • Record of targeted assistance program expenditures that verifies that funds have been used to meet the statutory requirements for such programs and not to supplant non-federal resources. <p><u>Interviews</u></p> <ul style="list-style-type: none"> • LEA and school staff expresses understanding of statutory requirement. • Participants express understanding of the intent and purpose of schoolwide programs and targeted assistance programs and the distinction between them. • LEA staff describes technical assistance provided by the SEA.

3.5: Audits. The purpose of this critical element is to review the findings, material weaknesses, reportable conditions, and suggestions noted in recent audits and the progress made by the SEA and LEA to correct deficiencies that may impact the administration and effectiveness of the Title I program at the SEA and LEA levels. Both SEAs and LEAs are responsible for obtaining audits in accordance with the Single Audit Act Amendments of 1996 and revised Office of Management and Budget (OMB) Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations." (See Section 80.26 of the Education Department General Administrative Regulations (EDGAR)). SEAs and LEAs will comply with all of the auditee responsibilities specified in Subpart C, Section 300(a) through (f) of OMB Circular A-133. As part of their responsibilities, they will prepare financial statements that reflect their financial positions, results of operations or changes in net assets, and, where appropriate cash flows for the fiscal year audited. (See Subpart C, Section 310 of OMB Circular A-133). Also, as part of their responsibilities, they will ensure that audits are properly performed and submitted when due. (See Subpart C, Section 320 of OMB Circular A-133). SEAs and LEAs must take corrective action on audit findings in accordance with Subpart C, Section 315 of OMB Circular A-133. In arranging for audit services under the Single Audit Act, the SEA and LEA will follow the requirements in Section 80.36 of EDGAR. (See 80.26(c)). Additionally, the SEA and LEA will comply with any audits, relating to the Title I program, conducted by Office of Inspector General under the authority of the Inspector General Act of 1978.

SEA REVIEW	LEA REVIEW
<p><u>Documentation</u></p> <ul style="list-style-type: none"> • Copies of the two most recent A-133 single audit reports, the two most recent financial statement audit reports, and any ED OIG audit reports issued within the last two years. • Copies of SEA corrective action plans and any related approval documents. • Copies of SEA policies and procedures for LEAs in resolution of audit findings. <p><u>Interview</u></p> <ul style="list-style-type: none"> • SEA staff discusses the status of corrective actions formulated subsequent to receipt of audit reports. • SEA staff describes the process for ensuring corrective action and how it follows up on corrective actions identified in the single audit process. • SEA staff discusses how it ensures that issues identified through the single audit process (both SEA and LEA levels) are resolved in a timely manner. • SEA staff demonstrates an understanding of requirements of audit procedures for the SEA. • SEA staff discusses how it tracks the resolution of issues in LEA single audits. • SEA staff discusses how it ensures that its LEAs are audited annually. • SEA staff describes any patterns of recurring findings in LEAs and what it has done to address these issues. • SEA staff describes how it utilizes data from the single audit process in its monitoring process. • SEA staff describes how it ensures that charter schools are included in single audits (both as schools within the LEA and as LEAs). 	<p><u>Documentation</u></p> <ul style="list-style-type: none"> • Copies of the two most recent A-133 single audit reports, the two most recent financial statement audit reports, and any ED OIG reports issued within the last two years. • Copies of LEA corrective action plans and any related approval documents. • Copies of LEA policies and procedures for the resolution of audit findings. <p><u>Interview</u></p> <ul style="list-style-type: none"> • LEA staff discusses the status of corrective actions formulated subsequent to receipt of audit reports. • LEA staff describes the process for ensuring corrective action and how the SEA follows up on corrective actions identified in the single audit process. • LEA staff discusses how it ensures that issues identified through the single audit process are resolved in a timely manner. • LEA staff demonstrates an understanding of requirements of audit procedures for the LEA. • LEA staff discusses how it tracks the resolution of issues in LEA single audits. • LEA staff describes any patterns of recurring findings and what it has done to address these issues. • LEA staff describes how it utilizes data from the single audit process in its monitoring process. • LEA staff describes how it ensures that charter schools are included in single audits.

3.6: Services to Eligible Private School Children. LEA complies with requirements in sections 1120 and 9306 of the Title I Statute, Section 443 of GEPA, and § 200.62 – 200.67, 200.77 and 200.78 of the regulations with regard to services to eligible private school children, their teachers and their families.

SEA REVIEW	LEA REVIEW
<p><u>Services to Private School Children</u></p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • Procedures that the SEA uses to determine that the required consultation occurred. • Evidence that LEAs have met the requirements for consultation, written affirmation and evaluation of the program. • Copies of affirmation forms from LEAs that the SEA has collected. • Evidence that LEAs have met the requirements for financial recordkeeping related to services to private school children that will facilitate an effective financial or programmatic audit. • Evidence that the SEA has provided information to LEAs that are serving eligible private school children through contracts with a third party to ensure that the third party is providing Title I services to eligible private school children in accordance with all Title I requirements. • Monitoring protocols that the SEA uses to monitor the requirements of provision of services to eligible children attending private schools. • SEA complaint procedures for private schools officials. • SEA staff can discuss technical assistance that has been provided to LEAs that are serving eligible private school children through contracts with a third party to ensure that the third party is providing Title I services to eligible private school children in accordance with all Title I requirements. 	<p><u>Services to Private School Children</u></p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> • Evidence that consultation has occurred between LEA and private school officials or its representatives regarding services for private school children prior to the LEA making any decision. • Copy of written affirmation from officials of private school or a representative. • Evidence that private school children that have been selected for services reside in a participating public school attendance area and meet the multiple academic criteria established by the LEA in consultation with private school officials. • Evidence that providers of services are employees of LEA or employees of third party contractor. • Documentation that all teachers and/or paraprofessionals employed by the LEA who provide services to private school children meet the Section 1119 requirements. • Evidence that the LEA is evaluating the Title I program serving private school students and making modifications if necessary. • Copy of third party contract(s) and invoices from the third party contractor (If applicable). • Evidence that the LEA regularly supervises the provision of Title I services to private school children. • Evidence that the LEA maintains control of the Title I funds, materials, equipment and property that support services to private school children. • Title I funded materials and equipment located at the private school are properly labeled. • Copy of SEA complaint procedures for private schools officials.

Element 3.6: Services to Eligible Private School Children. LEA complies with requirements in sections 1120 and 9306 of the Title I Statute, Section 443 of GEPA, and §§ 200.62 – 200.67, 200.77 and 200.78 of the regulations with regard to services to eligible private school children, their teachers and their families.

SEA REVIEW	LEA REVIEW
<p><u>Services to Private School Children</u></p> <p><u>Interview:</u></p> <ul style="list-style-type: none"> • SEA staff can discuss technical assistance that the SEA has provided to LEAs related to the provision of services to eligible private school children. • SEA staff can discuss how the SEA ensures that LEAs meet the requirements for consultation and written affirmation. • SEA staff can discuss how the SEA ensures that LEAs meet the requirements for financial recordkeeping related to services to private school children that will facilitate an effective financial or programmatic audit. • SEA staff can discuss how the SEA ensures that LEAs exercise oversight over contracts with individuals, associations, agencies or organizations that provide Title I services to private school children. • SEA staff understands that LEA is responsible for designing and implementing program only after required consultation. • SEA staff can discuss how the SEA monitors the requirements of provision of services to eligible children attending private schools. • SEA staff can discuss how the SEA complaint procedures are shared with LEA staff. 	<p><u>Services to Private School Children</u></p> <p><u>Interview:</u></p> <ul style="list-style-type: none"> • LEA staff understands that LEA is responsible for designing and implementing program only after required consultation. • LEA staff can discuss the LEA procedures for provision of services to eligible children attending private schools. • LEA staff can explain the process of approving and monitoring of third party contract. • LEA staff can explain how the invoices from third party contractors break out instructional costs and administrative costs separately. • LEA staff understands pooling option. • LEA staff understands that standards, assessments and annual progress must be established during consultation before any evaluation of the Title I program occurs. • LEA staff understands poverty for private school participants can be determined either each year or every 2 years. • LEA staff understands their role in supervising Title I services to private school participants. • LEA staff understands that all teachers/paraprofessionals employed by the LEA who provide services to private school participants must meet the Section 1119 requirements. • LEA staff understands that paraprofessionals providing instructional support are supervised and in close proximity to a highly qualified teacher employed by the LEA. • LEA staff can explain how the LEA maintains control of the Title I funds, materials, equipment and property that support services to private school children.

3.6 Services to Eligible Private School Children. LEA complies with requirements in sections 1120 and 9306 of the Title I Statute, Section 443 of GEPA, and §§ 200.62 – 200.67, 200.77 and 200.78 of the regulations with regard to services to eligible private school children, their teachers and their families.

SEA REVIEW	LEA REVIEW
<p><u>Services to Teachers and Families of Participants</u></p> <p><u>Documentation</u> Procedures the SEA uses to ensure that its LEAs are providing services to teachers and families of private school participants meet Title I requirements.</p> <ul style="list-style-type: none"> If applicable, information provided to LEAs that are providing services to teachers and families of private school participants through contracts with a third party to ensure that the third party is providing these services in accordance with all Title I requirements. 	<p><u>Services to Private School Children</u></p> <p><u>Principal, Private School Official or Regular Classroom Teacher</u></p> <ul style="list-style-type: none"> Principal/official/teacher can discuss consultation and the role that he/she had in determining the Title I program for eligible students. <p><u>Services to Teachers and Families of Participants</u></p> <p><u>Documentation</u></p> <ul style="list-style-type: none"> If applicable, copies of information provided to LEAs that are providing services to teachers and families of private school participants through contracts with a third party to ensure that the third party is providing these services to teachers and parents in accordance with all Title I requirements. Evidence that professional development and parental involvement activities have been planned for teachers and families of private school participants in consultation with private school officials. Copies of financial records related to professional development and parent involvement activities including invoices that fully disclose the amount and disposition of the funds and the total costs of the activity for which the funds are used. <p><u>Interview</u></p> <ul style="list-style-type: none"> LEA staff can discuss the specific activities that have been planned for families of private school participants. LEA staff can discuss the specific activities that have been planned for teachers of private school participants. Principal/official can discuss the professional development activities that have been or will be offered to teachers of Title I participants. Principal/official can discuss the parental involvement activities that have been or will be offered to families of Title I participants.

3.7 Complaint Procedures. The SEA has a system for ensuring fair and prompt resolution of complaints.

Sec. 9304(a)(3)(C)

SEA REVIEW	LEA REVIEW
<p><u>Documentation</u></p> <ul style="list-style-type: none"> • State complaint policy and procedures. • Procedures for tracking complaint process. • Reports on complaint resolutions. • Documents indicating that complaint procedures were implemented. • Evidence that complaints are addressed, investigated and resolved in a timely manner. • Documentation that information on the complaint process has been widely disseminated to LEAs statewide. <p><u>Interview</u></p> <ul style="list-style-type: none"> • SEA staff describes complaint policies and procedures. • SEA staff discusses technical assistance to LEAs regarding complaint policies and procedures. • SEA staff demonstrates understanding of connection between school improvement and effective use of complaint procedures. 	<p><u>Documentation</u></p> <ul style="list-style-type: none"> • LEA complaint policy and procedures. • Procedures for tracking complaint process. • Reports on resolution of complaints. • Documents indicating that complaint procedures were implemented. • Evidence that complaints are addressed, investigated and resolved in a timely manner. <p><u>Interview</u></p> <ul style="list-style-type: none"> • Staff describes complaint policies and procedures. • Staff discusses technical assistance to schools regarding complaint policies and procedures. • Staff demonstrates understanding of connection between school improvement and effective use of complaint procedures.

3.8 Committee of Practitioners (COP). The SEA establishes a Committee of Practitioners (COP) and involves the committee in decision making as required.

Sec.1903 (b)
Sec.1111 (c)(11)

SEA REVIEW	LEA REVIEW
<p><u>Documentation</u></p> <ul style="list-style-type: none"> • COP has a membership comprised of representatives from LEAs, as a majority of its members; administrators; teachers, including vocational educators; parents; members of local school boards; representatives of private school children; and pupil services personnel. • COP advises the State in carrying out its Title I responsibilities, including reviewing any proposed or final State Title I rule or regulation before its publication and developing and monitoring the implementation of the State's plan. • Evidence that the COP has been involved in matters regarding the State administration of Title I programs. <p><u>Interview</u></p> <ul style="list-style-type: none"> • SEA staff clearly articulates the process for selecting the COP. • SEA staff clearly articulates the process for engaging the COP in State decisions. • SEA staff articulates how the COP has been and is regularly involved in advising the State on its Title I responsibilities, particularly the review of any proposed or final State Title I rule or regulation before its publication and developing and monitoring the implementation of the State's plan. 	<p>SEA requirement</p>

3.9 Equipment and Real Property. The purpose of this critical element is to review the SEA's and LEA's controls over the procurement, recording, custody, use, and disposition of Title I equipment in accordance with the provisions of State policies and procedures, the No Child Left Behind Act (NCLB), the Improper Payments Information Act, standards of internal control, and any other relevant standards, circulars, or legislative mandates. Both the SEA and the LEA must comply with the requirement in section 80.32(b) of the Education Department General Administrative Regulations (EDGAR) with regard to equipment (i.e., the State and the LEA will use, manage, and dispose of equipment acquired under a grant by the State in accordance with State laws and procedures). Likewise, both the SEA and the LEA must comply with the requirement in section 80.36(a) of EDGAR with regard to procurement (i.e., when procuring property and services under a grant, the State and LEA will follow the same policies and procedures they use for procurements from its non-Federal funds). Additionally, Sections 9304 and 9305 of the No Child Left Behind Act require the State and the LEA, respectively, to file an assurance, in its consolidated plan or application, that it uses fiscal control and fund accounting procedures as will ensure proper disbursement of, and accounting for, Federal funds. Similarly, Section 443(a) of the General Education Provisions Act (GEPA) requires the SEA and the LEA to keep records that fully disclose the amount and disposition by the recipient of Federal funds, the total cost of the activity for which the funds are used, the share of that cost provided from other sources, and such other records as will facilitate an effective audit.

SEA REVIEW	LEA REVIEW
<p><u>Documentation</u></p> <ul style="list-style-type: none"> SEA policies and procedures addressing the procurement, recording, custody, use, and disposition of Title I equipment. The most recent SEA inventory list of Title I equipment. Lease agreements for equipment and real property. If the SEA is using consolidated administration of Federal funds, discuss modified documentation requests during pre-site visit teleconference. <p><u>Interview</u></p> <ul style="list-style-type: none"> SEA staff describes the process for monitoring LEA compliance with all applicable policies, procedures, and controls addressing procurement, custody, recording, use, and disposition of Title I equipment. SEA staff describes justification process for equipment purchase/lease with Title I funds 1) is reasonable and necessary to effectively operate its Title I program; 2) demonstrates existing equipment will not be sufficient and; 3) determines costs are reasonable. SEA staff explains the system for approving the purchase or lease of equipment with Title I or consolidated funds. SEA provides evidence of a process to control and account for Title I equipment removed from the facility for off site use. SEA staff describes the process for the disposition of equipment. SEA staff provides evidence of conducting an annual physical inventory of equipment with documentation from the most recent inventory to include a description of each equipment item, location, tag or barcode number, cost, and date of purchase. 	<p><u>Documentation</u></p> <ul style="list-style-type: none"> LEA policies and procedures addressing the procurement, recording, custody, use, and disposition of Title I equipment. The most recent LEA inventory list of Title I equipment. Lease agreements for equipment and real property. Modified documentation request if the LEA is using consolidated administration of Federal funds. <p><u>Interview</u></p> <ul style="list-style-type: none"> LEA staff describes the process by which the SEA monitors the LEA for compliance with all applicable policies, procedures, and controls addressing procurement, custody, recording, use, and disposition of Title I equipment. LEA staff describes justification process for equipment purchase/lease with Title I funds 1) is reasonable and necessary to effectively operate its Title I or schoolwide program; 2) demonstrates existing equipment will not be sufficient and; 3) determines costs are reasonable. LEA staff explains the system for approving the purchase or lease of equipment with Title I or consolidated funds.

3.9 Equipment and Real Property. The purpose of this critical element is to review the SEA's and LEA's controls over the procurement, recording, custody, use, and disposition of Title I equipment in accordance with the provisions of State policies and procedures, the No Child Left Behind Act (NCLB), the Improper Payments Information Act, standards of internal control, and any other relevant standards, circulars, or legislative mandates. Both the SEA and the LEA must comply with the requirement in section 80.32(b) of the Education Department General Administrative Regulations (EDGAR) with regard to equipment (i.e., the State and the LEA will use, manage, and dispose of equipment acquired under a grant by the State in accordance with State laws and procedures). Likewise, both the SEA and the LEA must comply with the requirement in section 80.36(a) of EDGAR with regard to procurement (i.e., when procuring property and services under a grant, the State and LEA will follow the same policies and procedures they use for procurements from its non-Federal funds). Additionally, Sections 9304 and 9305 of the No Child Left Behind Act require the State and the LEA, respectively, to file an assurance, in its consolidated plan or application, that it uses fiscal control and fund accounting procedures as will ensure proper disbursement of, and accounting for, Federal funds. Similarly, Section 443(a) of the General Education Provisions Act (GEPA) requires the SEA and the LEA to keep records that fully disclose the amount and disposition by the recipient of Federal funds, the total cost of the activity for which the funds are used, the share of that cost provided from other sources, and such other records as will facilitate an effective audit.

SEA REVIEW	LEA REVIEW
<p><u>Interview</u></p> <ul style="list-style-type: none"> SEA staff describes the policy for equipment and real property purchased with Title I funds that are utilized to support other educational programs or projects. SEA staff explains how charges are allocated as appropriate if equipment is being used for purposes other than Title I. SEA staff describes procedures addressing the purchase or lease of assets, other than equipment (i.e., mobile classrooms), that are acquired or leased with Title I funds. 	<ul style="list-style-type: none"> LEA staff provides evidence of a process to control and account for Title I equipment removed from the facility for off site use. LEA staff describes the process for the disposition of equipment. LEA staff provides evidence of conducting an annual physical inventory of equipment with documentation from the most recent inventory to include a description of each equipment item, location, tag or barcode number, cost, and date of purchase. <p><u>Interview</u></p> <ul style="list-style-type: none"> LEA staff describes the policy for equipment and real property purchased with Title I funds that are utilized to support other educational programs or projects. LEA staff explains how charges are allocated as appropriate if equipment is being used for purposes other than Title I. LEA discusses procedures for purchase or lease of assets, other than equipment (i.e., mobile classrooms), that are acquired or leased with Title I funds.

3.10 Procurement and Disbursement Controls. The purpose of this critical element is to review the SEA and LEA controls over the procurement of goods and services and the disbursement of Title I funds in accordance with the provisions of State policies and procedures, the NCLB, the Improper Payments Information Act, standards of internal control, and any other relevant standards, circulars, or legislative mandates. With respect to procurement, the SEA and LEA will comply with the requirement in Section 80.36(a) of the Education Division General Administrative Regulations (EDGAR) which establishes that when procuring property and services under a grant, both the State and the LEA will follow the same policies and procedures they use for procurements from their non-Federal funds. Likewise, with respect to cash disbursements the SEA and LEA will comply with the requirement in Section 80.20(a) of EDGAR, which establishes that a State must expend and account for grant funds in accordance with State laws and procedures for expending and accounting for its own funds. Also, the State and the LEA must comply with Section 76.702 of EDGAR, which requires that a State or a subgrantee use fiscal control and accounting procedures that insure proper disbursement of and accounting for Federal funds. Retention and access of records are governed by the requirements in Section 80.42(a)(1) and (b). Additionally, Sections 9304 and 9305 of the No Child Left Behind Act require the State and LEA, respectively, to file an assurance, in its consolidated plan or application, that it uses fiscal control and fund accounting procedures as will ensure proper disbursement of, and accounting for, Federal funds. Similarly, Section 443(a) of the General Education Provisions Act (GEPA) requires the SEA and the LEA to keep records that fully disclose the amount and disposition by the recipient of Federal funds, the total cost of the activity for which the funds are used, the share of that cost provided from other sources, and such other records as will facilitate an effective audit. In determining indirect cost rates, both the SEA and the LEA must meet the applicable, statutory requirements in Sections 76.560 through 76.569 of EDGAR. Sections 76.564 through 76.569 deal specifically with restricted indirect cost rates, which apply to agencies of State and local governments that are grantees under programs with a statutory requirement prohibiting the use of Federal funds to supplant non-Federal funds, and to their sub grantees under these programs. Section 80.22(b) of EDGAR references the general cost principles in the Office of Management and Budget (OMB) Circular A-87 that apply to State and local governments in determining the allowability of indirect costs. Reference to Section 80.22(b) is set forth in Section 76.530. Indirect cost rates will be reviewed, negotiated and approved by the cognizant Federal agency in accordance with OMB Circular A-87, attachments E(1) and F(5).

SEA Review	LEA Review
<p><u>Documentation</u></p> <ul style="list-style-type: none"> ▪ Copies of the SEA policies and procedures addressing procurement and cash disbursements. ▪ Evidence of Federal and State contributions if SEA is using consolidated administration to manage and account for Federal funds. ▪ Current list of all SEA Title I personnel, instructional and administrative. 	<p><u>Documentation</u></p> <ul style="list-style-type: none"> ▪ Copies of the LEA policies and procedures addressing the procurement and cash disbursements. ▪ Current list of all Title I personnel, instructional and administrative. ▪ Evidence of Federal and State contributions if LEA is using consolidated administration to manage and account for Federal funds.

APPENDIX B: MONITORING INDICATORS FOR TITLE I, PART B: EVEN START

Standards, Assessments, and Accountability Indicators

Indicator #: 1.1: The SEA complies with the subgrant award requirements. Sections 1232(e)(1); 1233(b)(1); 1238; and 1903(b)	
SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Request for proposals (RFPs) or requests for applications (RFAs) • Selection criteria and priorities if not included in RFP or RFA • Sample(s) of funded applications • State rules, written policy, or guidance about the Even Start subgrant competition • Membership of Committee of Practitioners • Peer review panel(s) composition <p><u>Interview:</u></p> <ul style="list-style-type: none"> • Staff evidences understanding of application and subgrant award requirements, including eligible entities, application content, matching, selection criteria and priorities, and award process for new and continuation awards • Staff explains how SEA uses the Committee of Practitioners during subgrant award process 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • RFP or RFA • Comments received from review panel • Grant awards <p><u>Interview:</u></p> <ul style="list-style-type: none"> • Staff describes the application process

Indicator #: 1.2: The SEA requires applications to submit applications for subgrants with the necessary documentation. Section 1237	
SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> Application form-that includes (1) information on qualified personnel; (2) description of program objectives and consistency with State indicators of program quality; (3) description of activities including the program elements; (4) description of population served; (5) description of collaborative efforts; (6) statement of methods that will be used to ensure project will serve families most in need, individuals with special needs, and a retention plan; (7) description of how the plan is integrated with other programs; and (8) information on local evaluation and how data will be used for improvement. <p><u>Interview:</u></p> <ul style="list-style-type: none"> Staff describes how the application is disseminated to eligible entities Staff describes the process for developing the application and the role of the Committee of Practitioners in developing the application 	N/A

Indicator #: 1.3: In making non-competitive continuation awards, the SEA reviews the progress of each subgrantee in meeting the objectives of the program and evaluates the program based on the indicators of program quality, and refuses to award subgrant funds to an eligible entity if the agency finds that the entity has not sufficiently improved the performance of the program. Section 1238(b)(3) and (4)

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Review form or protocol used by SEA for making continuation awards • Description of process used by SEA to make continuation awards • Names of projects determined to be making insufficient progress and rationale for this justification • Evidence of technical assistance provided to projects not making sufficient progress • Hearing record for projects discontinued <p><u>Interview:</u></p> <ul style="list-style-type: none"> • Staff discusses the process used to review the annual progress of subgrantees • Staff describes how the State indicators of program quality are used to determine sufficient progress • Staff discusses the process used to provide technical assistance and then, if necessary, discontinue projects not making sufficient progress 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Annual report to SEA <p><u>Interview:</u></p> <ul style="list-style-type: none"> • Staff discusses the process used to review their progress • Staff demonstrates understanding of the standard used to determine adequate progress

Indicator #: **1.4:** The SEA develops, based on the best available research and evaluation data, indicators of program quality for Even Start programs, and uses the Indicators to monitor, evaluate, and improve projects within the State. The SEA ensures compliance with Even Start program requirements. Section 1240; 34 CFR sections 76.700, 76.722, 76.730, 76.731, and 76.770

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> The indicators developed by the SEA, <ol style="list-style-type: none"> with the respect to eligible participants in a program who are adults, document- <ol style="list-style-type: none"> achievement in the areas of reading, writing, english-language acquisition, problem solving, and numeracy; receipt of secondary school diploma or a general equivalency diploma (GED); entry into a postsecondary school, job retraining program, or employment or career advancement, including the military; and such other indicators as the State may develop with respect to eligible participants in the program who are children, document- <ol style="list-style-type: none"> improvement in ability to read on grade level or reading readiness; school attendance; grade retention and promotion; and such other indicators at the State may develop. Monitoring instruction or protocol, based on State indicators of program quality Established cycle of monitoring, at least annually State evaluation, if any, incorporating Indicators of Program Quality Evidence (i.e., meeting, agendas, communications with projects) about improvements needed based on performance on the Indicators of Program Quality <p><u>Interview:</u></p> <ul style="list-style-type: none"> Staff can discuss how the indicators were developed and what changes have been made in the indicators since they were first developed Staff evidences use of the Indicators of Program Quality to monitor, evaluate, and improve local projects State explains schedule of monitoring Staff describes monitoring process, including use of the State indicators of program quality, on-site procedures, data review, and the reporting and corrective action processes Staff evidences understanding of statutory local program requirements (including uses of funds, participant eligibility, and required program elements), monitoring requirements, State monitoring procedures, and State indicators of program quality Staff demonstrates understanding of connection between participant academic achievement and effective use of monitoring 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> Staff knows about the indicators of program quality and how they are used Copy of monitoring report or letter from SEA Evidence that corrective action or recommendation has been address <p><u>Interview:</u></p> <ul style="list-style-type: none"> Staff knows about the indicators of program quality and how they are used Staff discusses the monitoring visit and the corrective actions or recommendations contained in the report or letter

Indicator #: 1.5: The SEA ensures that projects provide for an independent local evaluation of the program that is used for program improvement. Section 1235(15)

SEA REVIEW

Documentation:

- Sample local evaluation
- Examples of how local evaluations are used for continuous improvement
- Process used to hire and supervise local evaluators

Interview:

- State discusses how evaluations are tied to the State performance indicators
- Staff discusses how evaluation data are used for continuous improvement

LEA REVIEW

Documentation:

- Local evaluation report
- Evidence that data was used for continuous program improvement

Interview:

- Staff discusses how evaluation data are used for continuous program improvement

Program Support Indicators

Indicator #: 2.1: The SEA uses funds to provide technical assistance to local projects to improve the quality of Even Start family literacy services or comply with State indicators of program quality. Sections 1223(a)(2) and (3), and 1234(c)(4)

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> Record of subgrant, contract, or cooperative agreement, if used Record of allocation of funds for technical assistance Description and summary of technical assistance <p><u>Interview:</u></p> <ul style="list-style-type: none"> Staff evidences knowledge of the specific literacy needs of local Even Start programs. Which programs are targeted? How was program participation determined? 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> Certificates of attendance/completion <p><u>Interview:</u></p> <ul style="list-style-type: none"> What were the topics? What did you learn? Was it beneficial? Who provided the technical assistance? Which core components did the technical assistance pertain to? Under which authority is the technical assistance being provided?

Indicator #: 2.2: Each program assisted shall include the identification and recruitment of eligible families most in need, and serve those families. Sections 1235(1) and (14), and 1236

SEA REVIEW	LEA REVIEW
N/A	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> Lists of families in program with documentation of how each meets the eligibility criteria specified in Sec. 1236 Criteria for determining which eligible families are most in-need <p><u>Interview:</u></p> <ul style="list-style-type: none"> Do the families being served and recruited have a low level of income? Do the families being served have a low level of literacy or English language proficiency?

Indicator #: 2.3: Each program shall include screening and preparation of parents and enable those parents and children to participate fully in the activities and services provided. Section 1235(2)	
SEA REVIEW	LEA REVIEW
N/A	<u>Documentation:</u> <ul style="list-style-type: none"> • Summary/outline of screening process • Summary of family preparation activities/program <u>Interview:</u> <ul style="list-style-type: none"> • Are families tested to determine their level of literacy achievement? • Are families referred to necessary counseling or other support services in order to fully participate? • What support services are in the place for families?

Indicator #: 2.4: SEA ensures that all families receiving services participate in all four core instructional services. Section 1235(2) and 9101(2)	
SEA REVIEW	LEA REVIEW
<u>Documentation:</u> <ul style="list-style-type: none"> • RFP asks applicants to describe how the project will deliver services in all four core instructional areas • Funded projects describe plan to offer services in all four core instructional areas, and how families will be encouraged to participate in all four areas <u>Interview:</u> <ul style="list-style-type: none"> • How does staff reinforce the requirement for each family to participate in each core area? • What steps does the SEA take to ensure local projects are holding participants accountable for attending activities in all areas? 	<u>Documentation:</u> <ul style="list-style-type: none"> • Record of progress reports from local programs detailing participation rates in each core instructional area • A member of each family is enrolled in activities in each of the four core instructional areas • A member of each family is participating in activities in each of the four core instructional areas (as appropriate) • Action plan for removing families with incomplete participation, and enrolling new families <u>Interview:</u> <ul style="list-style-type: none"> • What steps does the program take to ensure participation in all four areas? • What are the consequences for participants who do not participate in all areas?

Indicator #: 2.5: Each program shall be designed to accommodate the participants' work schedules and other responsibilities, including the provision of support services, when those services are unavailable from other sources. Section 1235(3)

SEA REVIEW	LEA REVIEW
N/A	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Record of parent work schedules • Record of family support services appointments <p><u>Interview:</u></p> <ul style="list-style-type: none"> • Are activity schedules flexible? • Are activities offered at multiple times? • Is childcare provided for the period that parents are involved in the program? • Is transportation available to enable families to participate in programs?

Indicator #: 2.6: Each program shall include high-quality, intensive instructional programs that promote adult literacy and empower parents to support the educational growth of their children, and in preparation of children for success in regular school programs. Section 1235(4)

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> The State has provided guidance to local projects reinforcing the following recommended minimum intensity levels for hours <i>offered</i> for the four core components: <ul style="list-style-type: none"> Adult Education-60 hours per month Early Childhood Education (birth-3)-60 hours per month Early Childhood Education (3-4)-65 hours per month Parenting Education and Interactive Literacy Activities between Parents and Children-20 hours per month 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> Record of instructional programs offered, including number of hours offered in each core area Summary of content of adult literacy classes Summary of content of parent support classes Summary of content of early childhood education classes and supplemental services for school-age children Summary of content of interactive literacy activities for parents/children <p><u>Interview:</u></p> <ul style="list-style-type: none"> How are the parents being empowered to support the education of their children? How is the continuity between early childhood Even Start classes for children and their pre-K-12 education being ensured?

Indicator #: 2.7: Individuals providing academic instruction, whose salaries are paid in whole or part with Even Start funds, meet the statutory requirements for Even Start staff qualifications. Section 1235(5); Section 1235(5)(A)(i)(I); Section 1235(5)(A)(i)(II)

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • All instructional staff of the program hired after of the LIFT Act (December 21, 2000), whose salaries are paid in whole or in part with Even Start funds, meets the Even Start staff qualification requirements • By December 21, 2004 a majority of the individuals providing academic instruction, whose salaries are paid in whole or part with Even Start funds, shall have obtained an associate's, bachelor's, or graduate degree in a field related to early childhood education, elementary school or secondary school education, or adult education. • By December 21, 2004 if the applicable, a majority of the individuals providing academic instruction, whose salaries are paid in whole or part with Even Start funds, shall meet the qualifications established by the State for early childhood education, elementary or secondary education, or adult education provided as part of an Even Start program or another family literacy program. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Record of highest academic level of achievement of instructional personal • Copy of State requirements for instructional staff <p><u>Interview:</u></p> <ul style="list-style-type: none"> • How are you striving to meet the goal of recruiting highly qualified personnel?

Indicator #: 2.8: By December 21, 2004, the person responsible for administration of family literacy services, if that person's salary is paid in whole or part of Even Start funds, has received training in the operation of a family literacy program. Section 1235(5)(A)(ii)	
SEA REVIEW	LEA REVIEW
N/A	<u>Documentation:</u> N/A <u>Interview:</u> <ul style="list-style-type: none"> Staff explains plan for meeting the training requirements for local program administrators by December 21, 2004.

Indicator #: 2.9: By December 21, 2004, paraprofessionals who provide support for academic instruction, whose salaries are paid in whole or part with Even Start funds, have a secondary school diploma or its recognized equivalent. Section 1235(5)(A)(iii)	
SEA REVIEW	LEA REVIEW
N/A	<u>Documentation:</u> <ul style="list-style-type: none"> Record of academic achievement for all instructional paraprofessionals <u>Interview:</u> <ul style="list-style-type: none"> Staff explains plan for meeting the staff qualifications requirements as they relate to paraprofessionals by December 21, 2004

Indicator #: 2.10: The local programs shall include special training of staff, including child-care workers, to develop the necessary skills to work with parents and young children. Section 1235(6)	
SEA REVIEW	LEA REVIEW
N/A	<u>Documentation:</u> <ul style="list-style-type: none"> • Documentation of staff trainings and professional development • Sign-in sheets from staff trainings and professional development <u>Interview:</u> <ul style="list-style-type: none"> • Staff discusses the specific needs of staff for special training and how the needs are being met.

Indicator #: 2.11: The local programs shall provide and monitor integrated instructional services to participating parents and children through the home-based portion of the instructional program. Section 1235(7)	
SEA REVIEW	LEA REVIEW
N/A	<u>Documentation:</u> <ul style="list-style-type: none"> • Copies of lesson plans for home-based instructional services • Records of what lessons have been implemented, dates of implementation, and the names of families who participated <u>Interview:</u> <ul style="list-style-type: none"> • Staff explains the focus of home-based services and how projects use home-based services to integrate the core components of Even Start

Indicator #: 2.12: The local programs shall operate on a year-round basis, including the provisions of some program services, including instructional and enrichment services, during the summer months. Section 1235(8)	
SEA REVIEW	LEA REVIEW
N/A	<u>Documentation:</u> <ul style="list-style-type: none"> Record of program calendar Record of dates classes are offered <u>Interview:</u> <ul style="list-style-type: none"> What instructional services are offered during the summer? What enrichment services are offered during the summer months?

Indicator #: 2.13: The local program shall be coordinated with other relevant programs under the Adult Education and Family Literacy Act, the Individuals with Disabilities Act, and Title I of the Workforce Investment Act of 1988 and the Head Start program, volunteer literacy programs, and other relevant programs. Section 1235(9)(A)(B)(C)	
SEA REVIEW	LEA REVIEW
N/A	<u>Documentation:</u> <ul style="list-style-type: none"> Record of program coordination Record of cooperative agreements <u>Interview:</u> <ul style="list-style-type: none"> How are you coordinating Even Start with other programs? Which programs are you coordinating with?

Indicator #: 2.14: The local programs shall use instructional programs based on scientifically based reading research for children and adults, and reading-readiness activities for preschool children based on scientifically based reading research. Section 1235(10) and (12)	
SEA REVIEW	LEA REVIEW
<u>Documentation:</u> <ul style="list-style-type: none"> Evidence of State training and technical assistance to educate projects and provide technical assistance about scientifically based reading research techniques and resources (ie, training agendas, guidance, communications), for adults and children (including preschool age children) 	<u>Documentation:</u> <ul style="list-style-type: none"> Evidence of the scientific research that supports instructional programs Evidence that project uses the applicable statutory definition of scientifically based reading research (Section 1208, ESEA) Evidence of the scientific research that supports the reading-readiness activities <u>Interview:</u> <ul style="list-style-type: none"> Interview with local staff reflects selection and understanding of strategies, for children and adults, based on scientific research Interview with local staff reflects selection and understanding of reading readiness activities for preschool children based on scientifically based reading research

Indicator #: 2.15: The local program shall encourage participating families to attend regularly and to remain in the program a sufficient time to meet their program goals. Section 1235(11)	
SEA REVIEW	LEA REVIEW
N/A	<u>Documentation:</u> <ul style="list-style-type: none"> Summary of retention efforts Summary of intensity of services <u>Interview:</u> <ul style="list-style-type: none"> Have you been able to retain more families due to you retention efforts? How often do families participate on average?

Indicator #: **2.16:** The local program shall, if applicable, promote the continuity of family literacy to ensure that individuals retain and improve their educational outcomes. Section 1235(13)

SEA REVIEW

LEA REVIEW

N/A

Documentation:

- Plan for family literacy retention

Interview:

- What plans do you have for family literacy skill retention/?

Fiduciary Indicators

Indicator #: 3.1: The SEA complies with the allocation requirements for State administration and technical assistance, and award of subgrants. Section 1233(a) and (B)	
SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> Record of allocations for State administration and technical assistance that are within statutory maximums Record of subgrant amounts Technical assistance contracts, subgrants, or cooperative agreements Complete, current, written allocation procedures Record of any reallocation and carryover activity <p><u>Interview:</u></p> <ul style="list-style-type: none"> Staff evidences understanding of allocation requirements, State administration, technical assistance, and subgrant award amounts Staff evidences understanding of State administration and technical assistance requirements, and of how the funds are being used 	

Indicator 3.2: The SEA ensures that subgrantees comply with statutory and regulatory requirements on uses of funds and matching. Section 1234; 34 CFR §74.23, 76.530, 76.533, and 80.24

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Request for proposals or applications (RFP or RFA) • Record of subgrant amounts (see 3.1), funded year of each subgrant, and total annual matching contributions for each subgrant • Record of any SEA waivers of matching cost requirement • Evidence preventing conflict of interest issues (i.e, contract award policies, evidence of how contractors were selected) <p><u>Interview:</u></p> <ul style="list-style-type: none"> • Staff evidences understanding of matching requirement and minimum subgrant size • Staff evidences understanding of unallowable project costs, such as indirect costs and construction • Staff evidences understanding of federal and State conflict of interest policies 	

Indicator 3.3: The SEA complies with crosscutting maintenance of effort provision. Section 9521	
SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Maintenance of effort report comparing fiscal effort per student for eligible LEA-partners in preceding year to second preceding year • Evidence of reduction in subgrant award for any LEA that failed to maintain effort, or copy of waiver from SEA <p><u>Interview:</u></p> <ul style="list-style-type: none"> • Staff evidences understanding of funds to be included and excluded when determining maintenance of effort • Staff understands LEAs's Even Start subgrant must be reduced by the percentage short of 90% • Staff understands maintenance of effort can be determined by using fiscal effort per student or aggregate expenditures 	

Indicator #: **3.4:** The SEA ensures timely and meaningful consultation with private school officials on how to provide Even Start services and benefits to eligible elementary and secondary school students attending non-public schools and their teachers or other instructional personnel, and local programs provide an appropriate amount of those services and benefits through an eligible provider. Section 9501-9506

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • SEA policies and procedures for providing services Even Start-eligible elementary and secondary school students attending non-public schools. • Any third party contract(s) • Guidance to Even Start subgrantees on provision of services to eligible non-public school students • Evidence of subgrantee consultation with non-public schools, and copies of subgrantees budgets that document appropriate set asides • SEA complaint procedures for non-public school <p><u>Interview:</u></p> <ul style="list-style-type: none"> • Staff evidence understanding of budgeting, allocation of funds for eligible private school students • Staff demonstrate correct understanding of consultation regarding equitable services 	

Indicator #: 3.5: The SEA has a system for ensuring fair and prompt resolution of complaints and appropriate hearing procedures. Section 1238(b)(4)(B); 34 CFR §76.401(d), 76.770, 76.783, and 299.10

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • State hearing policy and procedures for non-continuations of subgrants • Written State complaint policy and procedures for disapproval of subgrant applications, audit findings ordering the repayment of funds, termination of assistance, and resolving other complaints • State hearing procedures • Procedures for tracking complaint process • Evidence that complaints are addressed, investigated and resolved in a timely manner and by appropriate hearings as required <p><u>Interview:</u></p> <ul style="list-style-type: none"> • Staff evidences an awareness of Even Start hearing requirements • Staff demonstrates understanding of complaint policies and procedures • Staff discusses technical assistance to Even Start applicants and subgrantees regarding complaint policies and procedures. 	

APPENDIX C: MONITORING INDICATORS FOR TITLE I, PART D (N/D)

**Student Achievement and School Accountability (SASA)
Monitoring Indicators**

Title I, Part D (N/D) Monitoring

Accountability

1.1: The SEA has implemented all required components as identified in its Title I, Part D (N/D) plan. For more detail about requirements, see Sec. 1414(a)	
SEA REVIEW	LEA REVIEW
<u>Documentation:</u> <ul style="list-style-type: none">Evidence that the SEA has developed and implemented a plan that includes program goals, objectives and performance measures used to assess the effectiveness of the N/D program. <u>Interview:</u> <ul style="list-style-type: none">The SEA describes its plan and how it is used to guide the N/D program.	SEA requirement

1.2: The SEA ensures that State Agency (SA) plans for services to eligible N/D students meet all requirements. For more detail about requirements, see Sec. 1412(A); Sec. 1414(a) and 1414(c)	
SEA REVIEW	LEA REVIEW
<u>Documentation:</u> <ul style="list-style-type: none"> • Evidence the SEA provides guidance to State Agencies (SA) on developing or revising Subpart 1 applications and plans. • Evidence that the SEA has a written review process for awarding Part 1 subgrants to SA. • SEA provides evidence that SA Subpart 1 programs demonstrate that the programs address the intent and purposes of the N/D program. <u>Interview:</u> <ul style="list-style-type: none"> • The SEA describes guidance it provides the SA on developing or revising its N/D plan. • The SEA describes the SA application and selection process for Subpart 1. • The SEA describes how it reviews and evaluates the Subpart 1 plans. 	<u>Documentation:</u> <ul style="list-style-type: none"> • SA plans contains the 19 required elements - including procedures, assurances, and descriptions of services. • Evidence that the SA's N/D program is supplemental to the required instructional program. <u>Interview:</u> <ul style="list-style-type: none"> • The SA describes the 19 required elements in its plan. • The SA describes the overall school program including length of school day.

1.3: The SEA ensures that Local Education Agency (LEA) plans for services to eligible N/D students meet all requirements.

For more detail about requirements, see Sec. 1423; Sec. 1425

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence that the SEA provides guidance to LEAs on developing or revising Subpart 2 applications and plans. • Evidence that the SEA has a written review process to award Part 2 subgrants to LEAs. • SEA provides evidence that LEA Subpart 2 programs demonstrate that the programs address the intent and purposes of the N/D program. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • The SEA describes guidance it provides the LEA on developing or revising its N/D plan. • SEA describes the LEA application and selection process for Subpart 2. • SEA discusses application and review process for LEA subpart 2 funding, including eligibility determination based on 'high numbers or percentages'. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • LEA plan contains the 13 required elements - including procedures, assurances, and descriptions of services. • Evidence that the N/D educational program in the local facility or institution is comparable to the one the LEA operates in the school that such youth would otherwise attend • Evidence that agreements between LEAs and correctional facilities provide the 11 required activities. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • LEA articulates how N/D program in the local facility or institution uses Subpart 2 supplemental funds to carry out activities, procedures, and policies that are stated in the plan submitted to the SEA.

Instructional Support N/D Subpart 1

2.1: The SEA ensures that institutionwide programs developed by the SA under Subpart 1 use the flexibility provided to them by law to improve the academic achievement of all students in the school.

For more detail about requirements, see Sec 1416

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none">• Evidence that the SEA provides guidance to SAs on the intent and purpose of institutionwide programs and program requirements.• Evidence that the SEA provides guidance to SAs on developing or revising institutionwide program plans. <p><u>Interview:</u></p> <ul style="list-style-type: none">• The SEA describes its process for guidance, applications, approvals and reviews for institutionwide projects.• SEA demonstrates knowledge about the process of combining funds in institutionwide programs.	<p><u>Documentation:</u></p> <ul style="list-style-type: none">• The SA institutionwide plans include the 8 required provisions, descriptions and assurances.• The SA ensures that schoolwide program schools maintain records that demonstrate that the program addresses the intent and purposes of the programs consolidated to support it. <p><u>Interview:</u></p> <ul style="list-style-type: none">• The SA describes the institutionwide program and how it serves the needs of all students.

Fiduciary Requirements N/D Subpart 1

3.1: The SEA ensures each State agency has reserved not less than 15 percent and not more than 30 percent of the amount it receives under Subpart 1 for transition services.

For more detail about requirements, see Sec. 1414(a)(1)(B); Sec 1418(a) and (b)

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> Evidence of guidance or notification sent to SAs outlining requirements for reserving funds for transition services under Subpart 1. <p><u>Interview:</u></p> <ul style="list-style-type: none"> SEA describes information and assistance provided to SAs on reservation requirements for transition services including: successful reentry; pre-placement programs; worksite programs; and other post-institution support services. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> Evidence that the SA reserves the appropriate amount of funds as required for transition services. Evidence that transition services are included in the SA N/D application. Evidence the SA provides transition services. <p><u>Interview:</u></p> <ul style="list-style-type: none"> Staff responsible for transition describe the transition plan and transition services provided to students in the N/D program.

3.2: The SEA conducts monitoring of its subgrantees sufficient to ensure compliance with Title I, Part D program requirements.

For more detail about requirements, see Sec 1426; Sec. 1431

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> Evidence the SEA monitors Subpart 1 and Subpart 2 programs, including: <ul style="list-style-type: none"> established cycle of monitoring copies of reports, corrective actions monitoring policies and procedures sample of letters, checklists, forms, etc. to SAs, LEAs, <p><u>Interview:</u></p> <ul style="list-style-type: none"> The SEA discusses monitoring process for Subparts 1 and Subpart 2 programs. The SEA discusses process for reviewing LEA N/D student outcomes and where necessary, identifying LEAs and institutions for reducing or terminating Subpart 2 funding. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> Evidence that the SA evaluates its N/D program to determine the program's impact on students. Evidence that the LEA evaluates its N/D program to determine the program's impact on students Evidence that the SA assesses the academic progress of students in correctional institutions or facilities. Evidence that the LEA assesses the academic progress of students in correctional institutions or facilities. <p><u>Interview:</u></p> <ul style="list-style-type: none"> The SA and LEA discuss how it measures and reviews student progress in order to determine the impact of the N/D program.

APPENDIX D: MONITORING INDICATORS FOR TITLE X, PART C

Student Achievement and School Accountability (SASA) McKinney-Vento Homeless Education Program

Instructional Support

2.1: The SEA implements procedures to address the identification, enrollment and retention of homeless students.
For more detail about requirements, see Title X Sec.722 (f) and (g)

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none">• Evidence that the SEA implements procedures that address the problems homeless children and youth face in school enrollment and retention.• Evidence that the SEA coordinates programs and services between the SEA, the State social services agency, and other agencies (including agencies providing mental health services) to assist in the identification, enrollment and retention of homeless students.• Evidence that the SEA implements procedures to ensure that:<ul style="list-style-type: none">- homeless children have equal access to public preschool programs;- homeless youth are identified and provided equal access to secondary schools and services;- homeless children and youth participate in before- and after-school programs;- homeless children and youth remain their school of origin; and- Parents and homeless family serving agencies are contacted to ensure the needs of homeless children and youth are being met. <p><u>Interview</u></p> <ul style="list-style-type: none">• SEA describes how it regularly gathers information to assist LEAs in implementing McKinney-Vento procedures, including students remaining in their school of origin.• SEA describes how it coordinates activities on behalf of homeless students with other agencies and service providers, including surveying if homeless students and parents needs are being met.• SEA describes activities to determine if parent and youth options for student enrollment are provided by LEAs.• SEA describes its activities and procedures on behalf of homeless preschool children and out of school youth.	

2.2: SEA provides, or provides for, technical assistance for LEAs to insure appropriate implementation of the statute.

For more detail about requirements, see Sec.722(e); Sec.722 (g)(3)(a)

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u> Evidence that the SEA provides technical assistance to LEAs on LEA requirements under the statute including:</p> <ul style="list-style-type: none"> • Information dissemination • outreach • coordination • professional development <p>Evidence the SEA provides State-level technical assistance activities to agencies, service providers and advocates for homeless children and youth</p> <p><u>Interview:</u></p> <ul style="list-style-type: none"> • SEA discusses its information and outreach efforts to create awareness of the needs and rights of homeless students. • SEA discusses technical assistance and guidance to LEAs, including professional development coordination and collaboration efforts with existing and new LEA homeless liaisons and responses to technical assistance requests. • SEA discusses [and describes types of contacts] how it informs school personnel, service providers, and advocates working with homeless families about the rights of homeless students and the duties of the LEA liaisons. • SEA describes its technical assistance to LEAs on removing enrollment barriers for homeless students • SEA staff describes how it coordinates services with local liaisons. • SEA describes how it informs liaisons of parental and youth notification requirements for placement decisions. 	<p><u>Documentation:</u> Evidence that the LEA reviews and revises policies and practices to ensure they do not act as barriers to enrolling homeless students, including:</p> <ul style="list-style-type: none"> • public notices of rights • letters, memoranda to assist enrollment • timeline-waivers for producing medical, school and other records • waivers for uniform fees <p>Evidence that the LEA designates a liaison for homeless children and youth. Evidence LEA liaison assists unaccompanied youth with school placement decisions. Evidence that the LEA ensures that transportation to the school of origin is provided. Evidence the LEA provides written notification to parents and youth regarding placement decisions. Evidence that local school and school district personnel receive appropriate information and technical assistance on the educational rights and needs of homeless students.</p> <p><u>Interview:</u></p> <ul style="list-style-type: none"> • LEA describes how it removes barriers to enrolling homeless students. • LEA describes how it makes school records available in a timely manner. • LEA describes how it provides comparable and coordinated services. • LEA describes how it ensures that homeless students are not segregated in separate schools or programs. • LEA homeless liaison discusses role and describes how: <ul style="list-style-type: none"> • homeless students are assisted with immediate enrollment and attending school • students receive services for which they are eligible, including before and after school programs. • parents are informed of opportunities to participate in education of their children • public notices of rights are disseminated • parents and youth receive written notification of placement decisions • school personal receive professional development training • coordination with shelters, hotels, motels and homeless serving agencies.

3.1: The SEA ensures that Local Education Agency (LEA) subgrant plans for services to eligible homeless students meet all requirements.

For more detail about requirements, see Sec. 722(e)(1); Sec. 723

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence the SEA has an application and approval process to provide competitive subgrants to LEAs. • Evidence that LEA subgrant applications are reviewed and awarded on a competitive basis for both need and quality. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • SEA staff discusses its review process and timelines for disbursement of subgrant funds. • The SEA describes its process for notifying LEAs, receiving applications, awarding grant funds, and timelines for disbursement of subgrants. • SEA describes how it reviews fiscal accountability of subgrantees. • SEA staff discuss measures of accountability used to evaluate the effects of subgrants. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence the LEA application/ plan includes assessment of the needs of homeless students and the supplemental services provided. • Evidence that the subgrant expands or improves services provided as part of regular academic program. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • The LEA describes the needs of homeless students in the district and the supplemental services provided with subgrant funds. • The LEA describes it's uses of funds to provide supplementary services for homeless students. • LEA describes it's anticipated outcomes for students receiving services.

3.2: The SEA ensures that the LEA complies with providing comparable Title I, Part A services to homeless students attending non-Title I schools.

For more detail about requirements, see Sec.1113(c)(3)(A); Sec. 1112(b)(1)((E)(ii)

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence that the SEA ensures that LEAs reserve funds to provide comparable Title I, Part A services. • Evidence that SEA ensures coordination of Title I with McKinney-Vento program for purposes of the required reservation. • Evidence that SEA is knowledgeable of the reservations made by local districts for Title purposes. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • SEA staff discusses guidance for LEA reservation of funds. • SEA staff discusses its review of LEA Title I plans to ensure coordination with McKinney-Vento. • SEA staff discusses the review process for local Title I reservations. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence the LEA reserves funds necessary to provide comparable services to homeless students attending non-Title I schools. • Evidence that the LEA Title I office collaborates with the homeless liaison on the uses of the Title I reservation. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • LEA describes the provision of comparable services for homeless students attending Title I and non-Title I schools.

3.3: The SEA has a system for ensuring the prompt resolution of disputes.

For more detail about requirements, see Sec. 722(g)(C)

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence SEA has an updated dispute resolution policy and procedures to include: <ul style="list-style-type: none"> - procedures for tracking disputes - documents indicating that dispute procedures have been implemented - Evidence that disputes are addressed, investigated and resolved in a timely manner - Evidence that SEA tracks if LEAs have a dispute resolution policy in place. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • SEA discusses guidance and technical assistance to LEAs for the prompt resolution of disputes. • SEA describes dispute resolution investigations and resolutions. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence LEA has and implements a process for the prompt resolution of disputes. • Evidence that parent or unaccompanied youth disputes are investigated and resolved in a timely manner <p><u>Interview:</u></p> <ul style="list-style-type: none"> • Staff demonstrates understanding of dispute resolution policies and procedures. • Staff describe how they assist families and youth with the dispute resolution process.

3.4: The SEA conducts monitoring of LEAs with and without subgrants, sufficient to ensure compliance with McKinney-Vento program requirements.

For more detail about requirements, see Sec. 722(g)(2) (A) and (B)

SEA REVIEW	LEA REVIEW
<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Written procedure for monitoring LEAs with and without subgrants to include: • Copies of reports, recommendations, actions • Monitoring policies and procedures, schedules for monitoring • Sample of letters to LEAs, checklists, forms • Examples of fiduciary monitoring of LEAs with subgrants • Examples of data collection requirements and how SEA determines if data is accurate <p><u>Interview:</u></p> <ul style="list-style-type: none"> • SEA describes its LEA monitoring and compliance process for McKinney-Vento - including onsite procedures. • SEA describes review of LEA data and reports on homeless students, including how it ensures accuracy of data. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> • Evidence the LEA collects information on homeless children and youth, including their places of residence. • Evidence LEA ensures that homeless students are included in statewide assessments. <p><u>Interview:</u></p> <ul style="list-style-type: none"> • LEA describes how it collects local data and transmits information requested on homeless students .to the SEA. • Describe how you determine if homeless students are being included in statewide assessments.